

NYC Solid Waste Management Plan 2026

Attachment J: Stakeholder Engagement and Responses to Comments

The *New York City 2026 Solid Waste Management Plan (SWMP26)* planning process began in 2022 and included extensive research and coordination among City agencies and stakeholders. Multiyear datasets on waste quantities, characterization, and waste management facilities were compiled and analyzed by a small team of the New York City Department of Sanitation (DSNY) staff and consultants. Research on current conditions, policy, waste management best practices, and emerging technologies was conducted to develop the SWMP, which proposes a wide range of strategies and initiatives to improve New York City's solid waste management system and reduce the quantity of waste disposed by the city. Unlike the last SWMP published in 2006, no physical infrastructure is proposed as part of *SWMP26*.

DSNY conducted 14 meetings with New York City agencies in 2024 and 2025. Additionally, DSNY conducted outreach to a number of City Council members and Borough Presidents, meeting with council members and borough presidents in 2025. DSNY also met with stakeholder groups including the Urban Resource Recovery, Solid Waste Advisory Board (SWAB) chairs, NYC Climate Leadership, and the Environmental Justice (EJ) Advisory Board.

On October 27, 2025, DSNY held a virtual public meeting to provide information on *SWMP26* and solicit comments. DSNY initially provided a public comment period of 45 days but extended the comment period to January 16th, 2026 for a total of 105 days. There will be ongoing opportunities for engagement as policies and initiatives pursuant to the SWMP are proposed and implemented. Additionally, DSNY encourages New Yorkers to get involved with stakeholder groups and community organizations that contribute to waste management and reduction efforts.

Agency Coordination

City agencies manage programs and infrastructure that support waste reduction, diversion, and recovery. DSNY identified the agencies that will play major roles in implementing *SWMP26*. These agencies include the New York City Housing Authority (NYCHA), New York City Department of Parks and Recreation (Parks), New York City Department of Environmental Protection (DEP), New York City Department of Education (NYCPS), Department of Citywide Administrative Services (DCAS), New York City Department of Transportation (NYC DOT), New York City Economic Development Corporation (EDC), New York City Department of Design and Construction (DDC), Mayor's Office of Environmental Remediation (MOER), and Mayor's Office of Climate Change and Environmental Justice (MOCEJ). **Table 1** describes how each of these agencies can support *SWMP26* initiatives.

Table 1. City Agency Coordination

City Agency	Reason for Involvement
New York City Department of Transportation (NYC DOT)	<ul style="list-style-type: none"> › NYC DOT operates recycled asphalt pavement (RAP) and recycled concrete aggregate (RCA) facilities in New York City and is interested in increasing the use of RAP and RCA and including recycled materials in asphalt mixtures. › NYC DOT also maintains the City-owned transportation infrastructure and designates truck routes. › DSNY coordinated with NYC DOT on waste reduction, reuse, and recycling goals and initiatives, specifically relating to RAP and RCA.
New York City Housing Authority (NYCHA)	<ul style="list-style-type: none"> › NYCHA oversees the collection of refuse and recycling for NYCHA properties. NYCHA has sustainability goals and strategies to improve waste management and recycling for existing properties and improve construction waste management for new developments. › DSNY aligned SWMP26 initiatives with NYCHA sustainability goals on waste reduction, reuse, and recycling activities.
New York City Department of Environmental Protection (DEP)	<ul style="list-style-type: none"> › DEP manages the city's water and wastewater treatment systems and the disposition of biosolids and other wastes. Newtown Creek WRRF also co-digests pre-processed organics collected by DSNY. › DSNY incorporated DEP biosolids, codigestion, and resource recovery goals in SWMP26. DEP also provided biosolids projections for SWMP26.
New York City Department of City Planning (DCP)	<ul style="list-style-type: none"> › DCP advances a wide range of citywide and neighborhood-level plans to increase housing access, expand economic opportunity, enhance resilience, and more. DCP supports the City Planning Commission in its review of land use applications and zoning amendments. › DCP and DSNY will collaborate on the <i>NYC Industrial Plan</i>.
Department of Citywide Administrative Services (DCAS)	<ul style="list-style-type: none"> › DSNY and DCAS collaborate on waste management initiatives, such as the Achieving Impact Reductions for Textile-Based Goods Purchased by the City of New York.
Mayor's Office of Climate and Energy Justice (MOCEJ)	<ul style="list-style-type: none"> › MOCEJ advances city policies and programs related to environmental justice, sustainability, and climate change (including waste reduction). › DSNY will work with MOCEJ and MOER on PlaNYC, Executive Order 23 (EO23) implementation, the Clean Soil Bank, and other waste reduction, reuse, and recycling programming.

Table 1. City Agency Coordination

City Agency	Reason for Involvement
Mayor's Office of Environmental Remediation (MOER)	<ul style="list-style-type: none"> › MOER operates the Clean Soil Bank, which transfers soil from construction sites to other public and private development projects in the city and provides clean soil to community and school gardens and for stormwater protection projects.
Mayor's Office of Food Policy (MOFP)	<ul style="list-style-type: none"> › MOFP works to increase food security; promote access to and consumption of healthy foods; and support economic opportunity, environmental sustainability, and equity in the food system. › DSNY included food rescue and recovery strategies to work on with MOFP.
New York City Public Schools (NYCPS)	<ul style="list-style-type: none"> › NYCPS manages the city's public school system. All K-12 schools participate in the Citywide Residential Organics Program, and NYCPS has sustainability initiatives including food donation, waste reduction, and recycling. › DSNY incorporated NYCPS sustainability programs and goals aligned with waste reduction, reuse, and recycling goals into <i>SWMP26</i>.
New York City Department of Parks and Recreation (Parks)	<ul style="list-style-type: none"> › Parks maintains the City's parks, playgrounds, recreation centers, beaches, and street trees. Parks manages tree debris and fallen trees and hosts MulchFest, where Christmas trees are chipped to create mulch. › DSNY incorporated Parks' waste reduction and recycling initiatives into <i>SWMP26</i> initiatives, specifically those relating to organics composting and chipping.
Economic Development Corporation (EDC)	<ul style="list-style-type: none"> › EDC is a nonprofit organization and public benefit corporation that serves as the City's official economic development corporation and manages public-private partnerships and City-owned real estate and infrastructure. › DSNY will collaborate with EDC on NYC Blue Highways initiatives to move goods, including municipal solid waste, via the city's waterways, reducing truck congestion, pollution, and roadway damage.

Other Stakeholders

Other stakeholder groups offered valuable feedback and opportunities for collaboration. The stakeholder groups identified in **Table 2** are involved in the *SWMP26* review process, represent New Yorkers, and/or are involved in the New York City solid waste management system.

Table 2. Other Stakeholder Group Coordination

Stakeholder Group	Reason for Involvement
New York State Department of Environmental Conservation (DEC)	<ul style="list-style-type: none"> › DEC requires and oversees the development of Local Solid Waste Management Plans (SWMPs), setting requirements for including waste data and waste projections, evaluating existing conditions, and identifying goals and alternatives for future waste management. › DEC oversees review and approval of <i>SWMP26</i>.
New York City Council	<ul style="list-style-type: none"> › New York City Council enacts local laws, including local laws that support <i>SWMP26</i> initiatives. › New York City Council is involved with coordination, review, and approval of <i>SWMP26</i>.
Environmental Justice Advisory Board (EJAB)	<ul style="list-style-type: none"> › EJAB is composed of environmental justice leaders; advocates, academics, public health experts, and other subject matter experts who support the City's studies on, and considerations of, environmental justice. › EJAB provided insight and strategy on environmental justice concerns related to waste management.
Solid Waste Advisory Boards (SWABs)	<ul style="list-style-type: none"> › SWABs provide oversight and advice to DSNY, City Council, and other relevant agencies. SWABs work with residents, waste management professionals, Borough Presidents, and other stakeholders to develop recommendations and support waste reduction and recovery programs. › SWABs hosted a series of learning sessions informing the public and stakeholders about the SWMP, held hearings, aggregated public feedback, and provided consolidated comments on <i>SWMP26</i> to DSNY.
Town and Gown Urban Resource Recovery (URR) Group	<ul style="list-style-type: none"> › Town+Gown is a citywide university-community partnership program that develops and supports applied built environment research projects. The URR working group focuses on City agency construction practices and policies to reduce construction and demolition (C&D) waste and support a local circular economy of C&D material. › The URR working group provided recommendations to DSNY for C&D waste prevention, reduction, and recovery.
Borough Presidents	<ul style="list-style-type: none"> › Borough Presidents represent and advocate for their boroughs' interests, appoint Community Board members, vote on land use decisions, and can provide discretionary funding to organizations and causes.

Stakeholder and Public Meetings

In 2024 and 2025, DSNY held meetings with stakeholders to present information from the SWMP and solicit feedback and suggestions on relevant initiatives. **Table 3** lists the stakeholder groups and individuals that participated in those meetings.

Table 3. Stakeholder Meetings

Stakeholder Type (Agency, Advocacy Groups or Organization, Elected Official, Public)	Meeting Date(s)	Stakeholder / Group Name
Agency	10/22/2024	New York City Department of Transportation (NYC DOT)
Agency	10/25/2024	New York City Department of Environmental Protection (DEP)
Agency	10/28/2024	New York City Housing Authority (NYCHA)
Agency	11/19/2024	Mayor's Office of Climate and Environmental Justice (MOCEJ) and Mayor's Office of Environmental Coordination (MOER)
Agency	11/21/2024	New York City Public Schools (NYCPS)
Agency	11/26/2024	New York City Department of Parks and Recreation (Parks)
Agency	11/26/2025	Executive Order 23 (EO23) Working Group
Agency	1/28/2025	Executive Order 23 Working Group
Agency	2/12/2025	New York City Department of Environmental Protection (DEP)
Agency	2/25/2025	Executive Order 23 Working Group
Agency	3/13/2025	New York City Public Schools (NYCPS)
Agency	3/13/2025	Economic Development Corporation (EDC)
Agency	3/25/2025	Executive Order 23 Working Group
Elected official	4/9/2025	New York City Council Member Abreu
Public	5/19/2025	Town & Gown Urban Resource Recovery (URR) Group
Elected official	6/23/2025	New York City Council Member Zhuang
Elected official	6/25/2025	New York City Council Member Paladino
Elected official	6/26/2025	New York City Council Member Ung
Advocacy group/organization	6/27/2025	Solid Waste Advisory Board (SWAB) Chairs
Elected official	7/2/2025	New York City Council Member Vernikov
Agency	7/3/2025	NYC Climate Leadership
Elected official	7/21/2025	New York City Council Member Gennaro

Table 3. Stakeholder Meetings

Stakeholder Type (Agency, Advocacy Groups or Organization, Elected Official, Public)	Meeting Date(s)	Stakeholder / Group Name
Elected official	7/22/2025	New York City Council Member Nurse
Advocacy group/organization	7/31/2025	Environmental Justice Advisory Board (EJAB)/Transform Don't Trash Coalition
Agency	7/31/2025	New York City Department of Environmental Protection (DEP)
Elected official	8/18/2025	Bronx Borough President
Elected official	8/18/2025	Staten Island Borough President
Elected official	8/26/2025	Manhattan Borough President
Elected official	8/26/2025	Queens Borough President
Elected official	9/4/2024	New York City Council Member Council Member Banks
Elected official	9/5/2025	Brooklyn Borough President
Public	10/27/2025	Public
Agencies	10/30/2025	Interagency SWMP Review
Elected officials, Public	12/9/2025	New York City Council
Elected official	Invited	New York City Council Member Menin
Elected official	Invited	New York City Council Member Salamanca
Elected official	Invited	New York City Council Member Carr
Elected official	Invited	New York City Council Member Felder
Elected official	Invited	New York City Council Member Morano

Public Engagement

On October 27, 2025, DSNY held a public meeting online to share information on *Draft SWMP26*. The meeting was recorded, and the recording and presentation slides are posted on DSNY's website.^{1,2} The recording includes DSNY responses to questions asked during the meeting.

On December 9, 2025, New York City Council held an oversight hearing on engagement for the *Draft SWMP26*. This hearing included oral public testimonies from 18 people and a collaborative testimony from elementary school students.

In addition, New York City SWABs hosted learning sessions and two public meetings to accept public testimony on *Draft SWMP26* as follows:

- Queens SWAB | October 22, 2025 | 12 testimonies
- Manhattan and Brooklyn SWAB | January 12, 2026 | 30 testimonies

The Brooklyn, Queens, and Manhattan SWABs coordinated and compiled comments to share with DSNY. The SWABs were formed to advance recycling goals, educate the public, and encourage community participation in the recycling program and resource recovery. The written comments and testimonies presented to DSNY by the SWABs

(including some of the testimonies that were also provided at the New York City Council hearing on December 9) are summarized in this attachment.

Public Comment Testimonies

DSNY solicited public comments via email. The comment period was initially set for 45 days but extended to January 16, 2026, for a period of over 100 days in response to comments requesting an extension. DSNY received approximately 60 public comment letters via email set up for this purpose from New York City residents, community groups, environmental organizations, businesses and industry groups, elected officials, agencies, and other stakeholders. DSNY appreciates these stakeholders for taking the time to review *Draft SWMP26* and thoughtfully respond with public comments. Furthermore, DSNY appreciates the overarching support indicated for the various programs proposed within *SWMP26*, and the acknowledgement of the invaluable role of sanitation workers in keeping New York City clean, safe, and healthy. DSNY recognizes the opportunity to improve *Draft SWMP26* and looks forward to continuing to integrate recommendations provided by the public in the final *SWMP26* and future planning and implementation efforts.

The majority of public comment testimonies submitted to DSNY included multiple topics, recommendations, and concerns. Public comment testimonies were parsed by topic, recommendation, or concern into individual comments. In order to provide concise responses, the parsed comments were condensed to highlight key points of the comments. This process may have resulted in some unintended loss of content, meaning, or context.

Parsed comments were categorized into broad categories and further sorted into subcategories. Within each subcategory, similar parsed comments were grouped together to reduce redundancy in the responses provided. The public comments were condensed into more than 300 grouped comments.

DSNY received public comment testimonies on the following topics:

- Information requests (e.g., data sources)
- Progress update requests regarding the implementation of existing or proposed laws and programs
- Waste incineration as it relates to pollution and environmental justice concerns, particularly in Newark, New Jersey
- Waste diversion from landfills and incinerators and support for circular economy strategies
- Environmental justice and waste equity concerns
- Codigestion and land application of biosolids, including perfluoroalkyl and polyfluoroalkyl substances (PFAS) concerns
- Food donation and food waste prevention
- Extended producer responsibility (EPR) policies
- Returnable Container Act (Bottle Bill) and the Bottle Bill update
- Outreach and education to promote DSNY's waste reduction and diversion programs
- Enforcement of recycling and organics separation requirements
- Commercial waste acceptance at DSNY transfer stations

- Waste management and material recovery technologies and facilities by companies expressing a desire to work with DSNY or accept material from DSNY/New York City
- Diversion of wood waste, textiles, biosolids, and organics and associated infrastructure

List of organizations and individuals who commented on the *Draft SWMP26*

The stakeholder groups and individuals that submitted comments are listed below with the date that comments were received. The abbreviation or name in parentheses identifies that group or individual in the categorized comments that follow.

Agencies

- New York City Department of Transportation (NYC DOT): 10/24/2025, 11/10/2025
- Department of Environmental Protection (DEP): 2/26/2026
- New York State Department of Conservation (DEC) provided comments on the *Solid Waste Management Plan Biennial Update Report* for the 2023-2024 reporting period, which included requests for the SWMP.

Public

- Gloria Boyce-Charles (Boyce-Charles), Queens SWAB (QSWAB) Testimony, 10/22/2025
- Natalie Bump Vena (Bump Vena), QSWAB Testimony, 10/22/2025
- DeeAnne Gorman (Gorman), QSWAB Testimony, 10/22/2025
- Mark Laster, Co-Chair of the Forest Hills Green Team, Third Vice Chair of Queens Community Board #6, Alumnus of Queens Borough President General Assembly, Licensed Social Worker (Laster), QSWAB Testimony, 10/22/2025
- Susan Latham, Chair of QSWAB (Latham), QSWAB Testimony, 10/22/2025
- Eileen Leonard (Leonard), QSWAB Testimony, 10/22/2025; Letter, 1/16/2026
- Andrea Scarborough, Board Member of QSWAB (Scarborough), QSWAB Testimony, 10/22/2025
- Justin Wood (Wood), 10/27/2025 (public meeting)
- Edward Grayson, former DSNY Commissioner (Grayson), 11/12/2025
- Margaret Roemer (Roemer), 11/12/2025
- Alice Scovell (Scovell), 11/12/2025
- Sean Basinski (Basinski), 11/17/2025
- Allie Encarnación (Encarnación), 11/17/2025
- Chloe Taufer (Taufer), 11/17/2025
- Weston Bargholz (Bargholz), 12/10/2025

- Joyce Bialik (Bialik), Brooklyn and Manhattan (BK + MN) SWAB Testimony, 1/12/2026
- Kiwi Callahan (Callahan), 1/12/2026
- Maggie Clark (Clark), 1/12/2026
- Samantha Cocco-Klein (Cocco-Klein), 1/12/2026
- DeNeile Cooper (D. Cooper), BK + MN SWAB Testimony, 1/12/2026
- Emily Coyne (Coyne), 1/12/2025
- Danielle Dookie (Dookie), BK + MN SWAB Testimony, 1/12/2026
- Betty Feibusch (Feibusch), 1/12/2026
- Pablo Ortega Garcia (Garcia), 1/12/2026
- Christine Hegel (Hegel), BK + MN SWAB Testimony, 1/12/2026
- Debbie Herdan (Herdan), BK + MN SWAB Testimony, 1/12/2026
- Audrey Jenkins (Jenkins), 1/12/2026
- David Kronheim (Kronheim), BK + MN SWAB Testimony, 1/12/2026
- Patrick Lindwall (Lindwall), 1/12/2026
- Madeleine McGillivray (McGillivray), 1/12/2026
- Jean Ryan (Ryan), BK + MN SWAB Testimony, 1/12/2026
- Anna Sacks (Sacks), BK + MN SWAB Testimony, 1/12/2026
- Sharon Silbermann, (Silbermann), 1/12/2026
- Florence Ruggiero (Ruggiero), 1/14/2026
- Ellen Cooper (E. Cooper), 1/15/2026
- Rachana Shah, Aspire to Zero (Shah), 1/15/2026
- Allison Allen, MSWAB member, Organics Committee chair (Allen), 1/16/2026
- Lauren Deitz (Deitz), 1/16/2026
- Sarah Gentile (Gentile), 1/16/2026
- Daphna Ezrachi, Climate Families NYC (Ezrachi), 1/16/2026
- Grace Lindsay (Lindsay), 1/16/2026
- Kristen Lasky (Lasky), 1/16/2026
- Samantha MacBride (MacBride), 1/16/2026
- Sarah Safford (Safford) 1/16/2026
- Gabriela Torrano (Torrano), 1/16/2026
- Ariadni Vezygrolou (Vezygrolou), 1/16/2026

Elected and Appointed Officials

- The following officials submitted a joint letter: Brad Lander, New York City Comptroller; Antonio Reynoso, Brooklyn Borough President; Councilmember Shaun Abreu, Chair of Sanitation Committee; Councilmember Alexa Aviles; Councilmember Chris Banks; Councilmember Jennifer Gutierrez; Councilmember Julie Menin; Councilmember Sandy Nurse; Councilmember Lincoln Restler; Councilmember Julie Won (Lander and elected officials), 11/7/2025
- Janine Pretente-Yusuf, Manhattan Community Board 4 Associate (MCB4), 1/13/2026
- Emily Gallagher, State Assembly Member District 50 (Gallagher), 1/14/ 2026
- Antonio Reynoso, Brooklyn Borough President, sent by Lacey Tauber (Reynoso), 1/14/2026

Organizations, Community Groups, and Nonprofits

- Environmental Advocates NY (EANY), submitted by Niamh Moore, 10/13/2025; 1/5/2026; 1/12/2026
- Chester Residents Concerned for Quality Living (CRCQL, Mayfield), submitted by Zulene Mayfield, QSWAB Testimony, 10/22/2025
- Civics United for Railroad Environmental Solutions (CURES), submitted by Mary Arnold, QSWAB testimony, 10/22/2025
- JH-SCRAPS Community Composting, (JH-SCRAPS), submitted by Melissa Zavala, QSWAB testimony, 10/22/2025
- The Octagon Neighborhood Association (TONA), submitted by Barbara DeYounge-Ezell, QSWAB Testimony, 10/22/25
- Southeast Queens Residents Environmental Justice Coalition (SQREJC), submitted by William Scarborough, QSWAB Testimony, 10/22/2025
- Queens Botanical Garden (QBG), submitted by Lou Reyes, QSWAB Testimony, 10/22/2025
- Queens Community Board 10 (Queens Community Board 10), submitted by Darryl Wesby, QSWAB Testimony, 10/22/2025
- Just Zero (Just Zero), submitted by Vanessa Zapata, 11/7/2025
- Ironbound Community Corporation (ICC), submitted by Alejandra Torres, 11/14/2025
- The Nature Conservancy (The Nature Conservancy), submitted by Victoria Dearborn, 11/17/2025
- New York League of Conservation Voters (NYLCV), submitted by Alia Soomro, 11/17/2025
- The New York Public Interest Research Group (NYPIRG), submitted by Blair Horner, 11/17/2025
- The New York Food Waste Action Network + Partners (includes: EANY, Full Circle Future, NYLCV, EarthJustice, Gotham Food Pantry, Just Zero, North Fork Environmental Council, City Harvest) (NYFWAN), submitted by Niamh Moore, 11/19/2025
- Beyond Plastics Queens (Beyond Plastics Queens), submitted by Victoria Augustine, 1/5/2026
- 350 BK, Plastic-Free Committee (350BK), submitted by Susan Boyle, 1/12/2026

- The Brotherhood Sister Sol (The Brotherhood Sister Sol), submitted by Nando Rodriguez, 1/12/2026
- Cafeteria Culture (CafCu), submitted by Tova Salzinger, BK + MN SWAB Testimony, 1/12/2026
- Chester Residents Concerned for Quality Living (CRCQL, Burman), submitted by Erica Burman, BK + MN SWAB Testimony, 1/12/2026
- Chester Residents Concerned for Quality Living (CRCQL, Fontaine), submitted by Nolan Fontaine, BK + MN SWAB Testimony, 1/12/2026
- FABSCRAP (FABSCRAP), submitted by Rachel Ceruti Choi, 1/12/2026
- Inner City Green Team Economic & Environmental Development (ICGT), submitted by Brigitte Charlton-Vicenty, Founder and CEO ICGT, BK + MN SWAB Testimony, 1/12/2026
- Sure We Can (Sure We Can), submitted by Ryan Castalia, 1/12/2026
- Seneca Lake Guardian (Seneca Lake Guardian, Taylor), submitted by Yvonne Taylor, 1/12/2026
- Seneca Lake Guardian (Seneca Lake Guardian, Campbell), submitted by Joseph Campbell, BK + MN SWAB Testimony, 1/12/2026
- Queens Botanical Garden (QBG), submitted by Lou Reyes, BK + MN SWAB Testimony, 1/12/2026
- New York State Waste to Energy Coalition (NYSWTEC), submitted by Becky Miller, 1/15/2026
- 350NYC (350NYC), submitted by Jane Selden, 1/16/2026
- Center for Zero Waste Design (CZWD), submitted by Clare Miflin, 1/16/2026
- City College New York: Earth Engineering Center (CCNY EEC), submitted by Marco Castaldi, 1/16/2026
- Clean Air Action Network of Glen Falls – CAAN (CAAN), submitted by Tracy Frisch, 1/16/2026
- Coalition for Sludge Free Land (CSFL), submitted by Vanessa Zapata, 1/16/2026
- Environmental Justice Alliance (NYC EJA), submitted by Celeste Perez, 1/16/2026
- Goodwill (Goodwill), submitted by Siera Smith-Vargas, 1/16/2026
- The Healthy Textiles Coalition (includes Climate Beneficial, Just Zero, Black Fiber & Textile Network, Remake, Torus Consulting, All Species Studio, SUAY, and California Product Stewardship Council) (The Healthy Textiles Coalition), submitted by Alexandra Farah, 1/16/2026
- Just Zero (Just Zero), submitted by Peter Blair, 1/16/2026
- Manhattan Solid Waste Advisory Board (MSWAB), submitted by Maggie Clark, 1/16/2026
- Mission503, Inc, (Mission503), submitted by Paula Yockel, 1/16/2026
- New York Lawyers for the Public Interest (NYLPI), submitted by Justin Wood, 1/16/2026
- Natural Resources Defense Council (NRDC), submitted by Eric Goldstein, 1/16/2026
- Pace University (Pace University), submitted by Sara Perl Egendorf, 1/12/2026
- Queens Community Board 5 (Queens Community Board 5), submitted by Gary Giordano, 1/16/2026
- Transform Don't Trash (TDT), submitted by Jenille Scott, 1/16/2026

- Third Act New York City, Sunrise NYC, Zero Waste New York, Council on Intelligent Energy & Conservation Policy, Rockland Coalition to End the New Jim Crow, Sierra Club New York City Group, Sustainable Sullivan, Waste for Life, Safe Energy Rights Group, Don't Waste New York, North American Climate, Conservation and Environment (Environmental Coalition), submitted by Anne Louise Rabe, 1/16/2026

Businesses and Industry

- Novamont (Novamont), submitted by Dan Martens, QSWAB Testimony, 10/22/2025
- AMP (AMP), submitted by Jack Bernardino, 11/17/2025
- Decarb Energy Partners (Decarb Energy Partners), submitted by Kevin Gallagher, 11/17/2025
- South Jersey Industries (SJI), submitted by Richard DeRose, 11/17/2025
- Mill Industries (Mill Industries), submitted by Emma Tyler, 11/20/2025
- Food Cycle Science (Food Cycle Science), submitted by Mitch Downton, 11/27/2025
- Waterloo Container (Waterloo Container), submitted by Mark C. Pitifer, 1/12/2026
- Gaia Strategies (GS), submitted by Kendall Christiansen, 1/16/2026
- Reworld (Reworld), submitted by Michael E. Van Brunt, 1/16/2026
- US Biochar Coalition (USBC), submitted by Sean Trambley on behalf of Maureen Walsh, 1/16/2026
- US Circular Economy Coalition (USCEC), submitted by Sean Trambley, 1/16/2026
- Waste To Energy Association (WTEA), submitted by Marilyn Lynch, 1/16/2026
- TOMRA (TOMRA), submitted by Charles Riegle, 1/19/2026

Comments and Responses by Program

Comments have been lightly edited, as needed, for brevity and clarity.

General/Multiple Programs

Comment 1. **Summary:** New York City residents, organizations, and elected officials express support for the *Draft SWMP26*, many noting its comprehensiveness.

Response 1. Thank you for supporting *SWMP26*. DSNY looks forward to advancing waste reduction and diversion in New York City through the implementation of *SWMP26*. DSNY also recognizes the importance of waste management to sustainability and climate education and action and looks forward to continuing to work with community groups, residents, students, businesses, academics, and elected officials to collaboratively advance these shared goals.

Detailed Comments

Hello, I'm writing to express my support of *SWMP26*. (Deitz)

I am writing in support of *SWMP26*. It is so critical to address the recent and emerging changes and needs related to waste management. NYC is a climate leader and waste is a big piece of that. We have to have ambitious plans. (Ezrachi)

I am writing in my support of the holistic review of city waste that is the solid waste management plan. Without a real understanding of the nature of the city's waste, the good work cannot be done to better manage it. We need this data to work towards a more sustainable and livable city. (Gentile)

As a NYC resident, and professor who teaches about sustainability, I am writing in support of the *Solid Waste Management Plan*. Particularly as a researcher, I appreciate its focus on data collection and analysis. (Lindsay)

Sanitation remains among the top concerns identified in our annual Statement of District Needs, and we welcome DSNY's renewed, comprehensive focus on improving the City's waste management systems, advancing the circular economy and enhancing neighborhood quality of life. (MCB4)

NYLCV supports the overall goals of DSNY's NYC 2026 *Solid Waste Management Plan* (*SWMP26*), which outlines a path for the reduction, recovery, and responsible management of New York City's residential, institutional, commercial, special and C&D waste for the next decade and, when possible, lay the groundwork for waste management practices in the decades beyond. (NYLCV)

We support the inclusion and implementation of waste reduction and recycling initiatives detailed in the *Draft 2026 SWMP*, including: expanded textile recycling and recycling rules for source separation of textiles; expanded food donation efforts at NYC Public Schools and businesses; reuse and repair centers; construction and demolition reuse and recycling facilities; and extended producer responsibility (EPR) legislation to incentivize waste reduction and use of recyclable materials by manufacturers of packaging and other commonly disposed materials; [and] Increased use of recycled asphalt in City projects. (NYLPI)

We wholeheartedly agree that the City must take every step possible to reduce the need for disposing of solid waste in landfills that could be located hundreds of miles away. (NYPIRG)

We believe that DSNY correctly identified ways to reduce post-recycled material in its SWMP. The lowering of overall tons of MSW will serve the community and surrounding communities well. We also believe the continued use of WTE facilities, as the plan calls for, is in line with the NY State SWMP and international standards and helps drive a more sustainable waste management system for NYC. (Reworld) (USCEC)

I am a grandmother living in Brooklyn and waste management is very important to me. I support *SWMP26*. (Safford)

I am writing to offer testimony of my strong support for the *Solid Waste Management Plan* as drafted currently. I believe it is comprehensive, does not rely on recycling for which plastics recycling specifically has eroded the overall success of the practice, and strongly consider

environmental justice concerns. There is no alternative here. There is nowhere to put the vast amounts of waste created by the city that won't affect poor, predominantly Black and brown communities elsewhere (whether in state or not, whether in the US or not). (Shah)

Waste is a touchpoint for all people and a gateway to further climate education. We can make significant progress in curbing climate change by changing perceptions around waste first. Then, we can connect the dots to other communal actions. NYC had been a leader until the pandemic began, and we have the opportunity to become one again by embracing this SWMP26 wholly and boldly. (Shah)

I am writing to formally express my support for the *Solid Waste Management Plan 2026* (SWMP26). (Torrano)

The SWMP26 is a comprehensive plan to address waste management in a way that keeps programs that work, considers effective partnerships, maintains that data needs to be collected regularly to measure success, provides transparency, prioritizes environmental justice, all while promoting regulations like reuse, education, and outreach. (Vezyroglou)

We believe the Plan reflects sound science, practical operational realities, and alignment with both state and international best practices for managing post-recycled municipal solid waste ... WTEA believes DSNY's continued use of Waste-to-Energy as part of its integrated waste-management strategy reflects best practices in environmental protection, climate mitigation, public safety, and infrastructure resilience. By combining aggressive waste-reduction efforts with responsible management of post-recycled material, DSNY can continue advancing its sustainability goals while maintaining reliable waste-disposal capacity and supporting New York City's energy and climate objectives. (WTEA)

WTEA supports DSNY's continued commitment to reducing overall waste generation and increasing recycling and composting. Reducing the amount of post-recycled material entering the waste stream benefits host communities and the broader region. (WTEA)

Thank you to the Department of Sanitation and its staff for preparing the *Draft 2026 Solid Waste Management Plan* and for inviting public feedback. (Gallagher)

- Comment 2.** Just Zero supports much of what the New York City Department of Sanitation ("DSNY") has included in the *Draft Plan*. We nonetheless have specific concerns about some elements in the *Draft Plan*, and we respectfully urge DSNY to make several amendments. (Just Zero)
- Response 2.** DSNY appreciates the time that stakeholders took to review the *Draft SWMP26* and to provide feedback and looks forward to working with stakeholders on *SWMP26* implementation.
- Comment 3.** **Summary:** The collaboration between City agencies and DSNY's plan development team is to be commended.
- Response 3.** DSNY appreciates the acknowledgement of the collaborative process to develop a comprehensive *SWMP26*.

Detailed Comments

Developed through years of collaboration across more than a dozen City agencies, the plan has the potential to meaningfully improve New Yorkers' daily lives—from how we separate and dispose of food waste through universal composting, to cleaner air and healthier communities, to fewer trucks, less noise, and safer, cleaner streets. (Lander and elected officials)

Credit to the Systems Thinkers at DSNY, DEP, DCAS, and Parks: The *Draft 2026 Solid Waste Management Plan* is a strong, intellectually sophisticated description of the current system. It clearly documents what has been accomplished since the 2006 SWMP ... The team drafting the SWMP, led by the current Deputy Commissioner for Solid Waste Management at DSNY, is to be commended ... As a descriptive document, it is more open, accountable, and transparent than predecessor documents, including past SWMPs and current Zero Waste Plan reports. (MacBride)

Mill applauds DSNY's embrace of new approaches and technologies to help address the very real hurdles to achieving the ambitious goals set forth in the plan. (Mill Industries)

Comment 4. By prioritizing diversion over disposal, the DSNY can advance decarbonization and sustainability of the city's solid waste program. (AMP)

Climate leadership demands innovation, implementation, and measurable results. (Decarb Energy Partners)

Response 4. DSNY prioritizes diversion over disposal in line with the EPA waste management hierarchy (*Draft SWMP26 Figure ES-1*). *SWMP26* includes a number of initiatives that support data- and results-driven innovation and climate leadership.

Comment 5. The *Draft SWMP26* repeatedly and problematically treats landfill disposal and [waste-to-energy] (WTE) as interchangeable rather than as distinct tiers within the EPA's waste management hierarchy. The hierarchy [is] included in the *Draft SWMP26* as Figure 3-4 ... The development of the hierarchy was in response to a growing interest in, and recognition of, the environmental impact of waste generated by society ... The placement of each management solution was deliberate with the aim of informing the public about those practices that should be engaged to cause the least environmental impact. It was developed with a recognition that managing waste requires energy, whether it is simply transported or separated such that valuable materials may be extracted and recovered (e.g., copper, aluminum, fiber, plastics, etc.). (CCNY EEC)

Response 5. DSNY agrees that landfill disposal and incineration (and WTE in general) are not interchangeable and had not stated otherwise in the *Draft SWMP26*. As indicated in the comment, **Figure 3-4** illustrates the higher preference for energy recovery as compared to landfilling. **Attachment B** further discusses the waste management hierarchy and how recovering energy from solid waste that cannot be economically and technically reused or recycled is favorable relative to disposal (including landfilling). DSNY also agrees that landfills and incinerators have different benefits and impacts as solid waste management strategies. Waste incineration generally results in greater resource recovery (including energy and metals); however, direct incineration of waste has higher air emissions from combustion (although landfills also have air emissions, including combustion emissions from landfill gas flares). The recovery of metals with incineration is acknowledged in **Chapter 2, Waste Generation and Materials Recovery Data** and **Attachment H, Review of**

Advanced Thermal Treatment Technologies (which also discusses the potential recovery of other materials). In the context of sustainable waste management, landfills and incinerators are grouped together as being at the bottom of the EPA management hierarchy (whereas waste reduction, reuse, and recycling are higher up). Without suggesting that landfills and incinerators are interchangeable, DSNY groups them in discussions of waste reduction, reuse, and recycling. While working to reduce waste managed for disposal, DSNY acknowledges the impacts of all types of waste disposal on the environment and host communities.

Improvements to Draft SWMP26

Comment 6. **Summary:** *SWMP26* should be more ambitious and propose transformative change instead of business as usual.

Response 6. New York City generates approximately 13 million tons of residential, commercial, construction and demolition, and other waste each year. *SWMP26* programs are designed to reduce waste, engage stakeholders, improve data collection and analysis, and consider innovation in programming. *SWMP26* balances optimism with achievable and actionable strategies. DSNY asserts that *SWMP26* **is** ambitious, with 124 strategies proposed for implementation across eight different programs that include all waste streams and focus on waste reduction and diversion. DSNY projects that over 30% of residential waste generated in the city would be diverted with full implementation of *SWMP26*. The projected diversion rate would be substantially higher than the existing diversion rate and would constitute a major accomplishment, given prior trends in the diversion rate, national averages, and the challenge of changing practices in our city of over 8 million residents. Furthermore, the development and implementation of *SWMP26* is intended to serve as the foundation for additional successful waste reduction and diversion programs in the future.

Detailed Comments

New York City deserves a much better plan. The great city deserves higher diversion rates, reuse and repair, composting, green jobs, and an unabashed focus on environmental justice. (350BK)

We cannot meaningfully reduce the waste exported to landfill and incinerators by pursuing the same policies that have failed to increase the diversion rate in the past, which is essentially what the DSNY *Solid Waste Management Plan* is proposing. We have an opportunity now to make effective changes in waste management policies and practices that will reduce waste at the source and increase the capture rate of recyclables. (350NYC)

NYC has a significant and serious waste problem that confronts us daily. Much more needs to be done to prioritize waste reduction, reuse, repair, and composting. With a new mayoral administration, we could be at a critical juncture with fresh eyes and out of the box leadership and hopefully a rejection of business as usual. (Allen)

There can be no doubt that New York City needs a revolutionary solid waste management plan. The City has for too long relied on shipping its solid waste to locations outside of the city. Not only is it environmentally unsound, but it is also staggeringly expensive. (NYPIRG)

With over 23 million tons of waste produced in the city each year, New Yorkers need a solid waste management plan that ensures waste is reduced, food is nutritious and accessible, and community members are engaged. (Bargholz) (Scovell)

I applaud initiatives outlined in the *SWMP* to facilitate material reuse and repair efforts in the coming years. I also applaud the initiatives to promote Extended Producer Responsibility and related waste reduction initiatives. However, on balance, in my opinion, the draft *SWMP* is not ambitious enough to meet the material challenges New York will likely face in the coming decade. (Coyne)

The City's *Draft 2026 SWMP* must be revised to focus on enactment of Zero Waste Alternatives within NYC—such as source separating and locally composting organics at scale in every Borough, instead of exporting organics as waste-by-rail to disposal in landfills and incinerators, or in PFAS-laden sewage sludge. New York City has proved over the past 15 years that changing waste export transportation modes from truck to rail and barge won't achieve the mandates of NYC's Zero Waste laws or NYS's Climate Leadership and Community Protection Act. Waste export by rail and barge to landfilling and incineration, under long term contracts with companies invested in disposal assets doesn't reduce the tonnage or toxicity of waste, or the externalization of health and environmental harms during processing, transport, and disposal. (CURES)

NYC must improve its waste diversion programs, like recycling and composting. And, it must educate residents on these programs. (Encarnación)

Reviewing the Department of Sanitation's draft solid waste plan, I wished it was more ambitious. It doesn't look much different from what the Department is currently working on. New York State's landfills are expected to be full within the next twenty years. Creative solutions are needed. The plan also doesn't go far enough in tackling the need to reduce waste. The *SWMP* draft plan needs to be stronger, increasing funding for education and engagement, and supporting and enforcing legislation that will reduce the amount of solid waste ... The streets of my neighborhood are awash in trash and I'm saddened whenever I see trash floating in the river. In the next twenty years, New York State's landfills are scheduled to reach their limit and alternate sites will have to be found. One answer to this problem, and a significant one, is to reduce the amount of waste created. (Leonard)

The *2026 SWMP* should be a visionary document that cements NYC as a global leader in sustainable and equitable waste management practices. However, in its current form, it primarily represents business as usual. I have a responsibility to my constituents to push for transformative change. (Reynoso)

Comment 7. **Summary:** *SWMP26* should make a stronger commitment to action and clearly articulate specific and measurable program deliverables, timelines, and reporting and evaluation mechanisms.

Response 7. DSNY appreciates the interest in program implementation details. *SWMP26* is a roadmap to achieving increased waste reduction and diversion alongside responsible management of waste. Available information on the implementation of programs, strategies, and initiatives is included in **Chapter 6, Implementation Plan and Schedule**. Chapter 6 also identifies timelines, potential partners and stakeholders, program evaluation metrics, and relevant legislation. DSNY will develop additional details as part of *SWMP26* implementation, and the information will be reported in biennial reports to DEC, which will be posted on DSNY's website. Further, the projected amounts

of waste generated and diverted should not be misinterpreted as DSNY goals. The projections were developed following DEC guidance and are an indication of what is realistic. New York City residents and businesses can help with surpassing DSNY's diversion projections by participating in existing and proposed programming.

Detailed Comments

Another area that should be prioritized under DonateNYC is reuse and repair as NYC must be one of the most wasteful cities in the country. The plan indicates DSNY will identify programs and consider partnerships (including with city institutions and agencies) which is also not very strong language. DSNY should make a stronger commitment with deliverables outlined ... the plan appears short on details and metrics for the 8 programs outlined on page 179. The wording used throughout the plan is vague (i.e., aim to increase, expand, make efforts, could, support, continue to attend). However, I was relieved to finally see milestones listed on page 189, although much more detail is needed and should be added into the final plan. Overall, I did not detect any real mandate or sense of urgency to reduce waste significantly in the near term. The plan did acknowledge the need for significant behavior change among a large and diverse population—no easy task. (Allen)

This *SWMP* projects improvements in waste reduction and diversion that fall far short of the City's and State's climate and waste goals, and below other leading cities. The *SWMP* should be revised to propose a timeline and benchmarks for measuring progress, to reach zero waste. (CZWD)

Generally, while we like many of the initiatives suggested in the *SWMP*, there is a lack of commitment and targets. Add definitive action items and evaluation of initiatives. (CZWD)

DSNY's goal of diversion of 30.5% by 2036 can be achieved. However, this *Draft Solid Waste Management Plan* doesn't include the DSNY commitments, publicly available data and reporting, or public engagement and evaluation plans to achieve this goal. More work on the plan is needed. (Dookie)

Waste equity outcomes depend almost entirely on diversion, yet diversion is weakly supported. Local Law 152's capacity caps function only as guardrails; meaningful reductions in truck traffic and community burden require actual reductions in waste volumes. The Draft Plan does not clearly explain how its programs will deliver those reductions or how impacts on affected districts will be measured ... The Draft Plan meets minimum procedural requirements to describe programs and scenarios, but it fails to credibly demonstrate how New York City will achieve its projected diversion outcomes or meet its legal obligations under state and local law ... Diversion targets are unsupported by enforceable commitments. *SWMP26* projects diversion rates of 30.5% for DSNY-managed waste and 54.7% for commercially managed waste by 2036, yet relies predominantly on exploratory language ("study," "consider," "evaluate") rather than binding implementation commitments, timelines, or performance metrics ... We urge the Department of Sanitation to provide substantive, written responses that: Clearly distinguish binding commitments from exploratory initiatives and assumptions ... Governance and operational alignment are not addressed. The Draft does not adequately explain how current senior leadership structures, staffing levels, and recent changes to uniformed sanitation worker operations are compatible with the sustained, differentiated operational focus historically required to improve recycling and organics diversion. We urge the Department of Sanitation to provide substantive, written responses that: define measurable outcomes, timelines, and accountability structures; [and] commit to

transparent, disaggregated, and consistent data reporting over the full planning horizon.
(Environmental Coalition)

As noted on page 40 of the Draft Plan, the recycling diversion rate declined from 18 percent in fiscal year 2018 to 17 percent in fiscal year 2022, and, according to Department reporting, recovered to approximately 18.5 percent in fiscal year 2025. While it is encouraging that diversion has rebounded to exceed pre-pandemic levels, the Department's stated goal of achieving an overall diversion rate of 30.5 percent by 2036 appears ambitious within this context. A more detailed description of how the Department's programs to increase diversion, as outlined in the October 27, 2025 public presentation, are expected to drive sustained improvements would be greatly appreciated ... I would also welcome clarification on several questions related to the Plan's implementation and accountability over time ... it would be helpful to understand whether the City intends to make sufficient, year-by-year commitments throughout the planning horizon to achieve full participation by the end of the Plan's timeframe. This could include, for example, conducting periodic studies of New Yorkers' understanding of and attitudes toward participation, piloting approaches that have demonstrated success in other jurisdictions, and funding education and outreach at levels consistent with best practices—such as approximately ten dollars per household per year—to move participation toward universal engagement. (Gallagher)

To be successful (reaching zero waste goals in 10 years), in a detailed, long-range plan] an array of legislation should be considered, and new ideas innovated to reduce the level of purchasing and other ways to reduce consumption of materials in products (e.g., bans of organics/recyclables sent to landfills/incinerators, bans of burning or burying reusable/repairable items, incentives (e.g., Pay As You Throw). [1] Annual measurable milestones (funded commitments) in prevention, reuse, recycling, composting, and education and outreach activities, tied to annual diversion targets. Each milestone must be measured annually to assure the plan is working as expected and be adjusted to improve efficacy of the programs if not; [2] Specific programs, legislation, incentives, infrastructure, and sufficient budgets for every initiative (milestone); [3] Each year of the plan should be designed to divert from incineration and landfilling a known percentage of the discard stream from disposal, so that by the end of the planning period (e.g., 10 years), the 90% goal would be achieved; [4] Planned contractual reductions in export tonnage each year from measurements of the contribution achieved by each initiative/milestone to the total diversion rate.
(MSWAB)

Develop a comprehensive SWMP aligned with measurable zero waste and SMM [Sustainable Materials Management] commitments designed to achieve 90% diversion within 10 years.
(MSWAB)

In its current form, the Draft does not achieve its full potential. It fails to describe programs with sufficient details and commitments needed to jolt programs to the next level. It does not incorporate needed deadlines and timetables against which progress can be measured. And, as presently drafted, it would allow future commissioners and city elected officials to evade responsibility if progress in achieving the plan's objectives creeps along at a snail's pace, despite city and state laws to the contrary ... Insert Action-Forcing Timetables, Intermediate Deadlines and Reporting Requirements: Government plans like the SWMP require timetables, deadlines, performance indicators, and mechanisms to track progress and provide for mid-course corrections if they are to fulfill their purpose. But the SWMP too often falls short in this area. Its favorite verbs are words like "consider," "explore," "monitor" or "study." Too often it fails the goal of becoming an action-forcing

document. NRDC recommends that the *Draft SWMP* undergo an extensive final edit before submission to the State Department of Environmental Conservation with the purpose of turning the document into more of an actual implementation plan. (NRDC)

Draft 2026 SWMP articulates broad goals and principles that have the potential to address major areas of concern across the five boroughs but does not provide the level of actionable detail necessary for transparency, accountability, or effective implementation over the next ten years. Major operational and policy elements are described in general terms without measurable milestones and inclusion of the community-led solutions provided in previous testimonies. A long-term waste plan must be more than aspirational, it must include target goals, how DSNY intends to achieve its goals, the necessary resources needed and any interim metrics that will be used to track the progress and success of these goals. Without specificity, the plan risks perpetuating the status quo rather than driving much needed systems change and continuing to put strain on already overburdened environmental justice communities. (NYC EJA)

There are concerns regarding commitment to resourcing. The plan reads as if many of the initiatives are too discretionary and not core to the department mission. It is important that these initiatives be sincerely pushed by the City and the Dept. of Sanitation. (Queens Community Board 5)

This SWMP is a decade-long plan but seems to state weak wishes, [and] the continuation of current practices and does not put forth a specific action plan with partners, rates, and dates. (Silbermann)

The recycling and diversion targets in the *Draft 2026 SWMP* are far below the targets set for the city. With DSNY's proposed programs in the draft plan, they estimate a 30.5% residential diversion by 2036 and 54% commercial diversion by 2036. However, the Zero Waste Act of 2023 establishes a goal of diverting 100% of recyclable and compostable material from the waste stream (away from landfills and incinerators) by 2030.³ The City has also committed to achieve high diversion rates through comprehensive organics collection, expanded material recovery, and producer responsibility. DSNY should adopt ambitious and achievable recycling and diversion targets that reflect best practices that will reach or even surpass the city's targets. DSNY needs to provide a clear roadmap for achieving high-uptake organics collection under Local Law 85 of 2023 and expand the city's material recovery capacity. A part of this roadmap should also include DSNY working collaboratively with the City Council and New York State to support legislation that eliminates single use plastics and provides more sustainable alternatives, requires or incentivizes fast food outlets to offer reusables instead of throw-away plastics and identify other opportunities to facilitate the greater use of reusables rather than single-use items ... We urge DSNY to revise the plan to include specific, measurable strategies to commit to a just transition away from incineration, to strengthen diversion and recycling targets, to reaffirm the environmental justice role of marine transfer stations, commit to a timeline for full implementation of CWZ [Commercial Waste Zones] and reconsider its expansion of anaerobic codigestion. (TDT)

Interagency and State Collaboration

Comment 8. **Summary:** DSNY should expand collaboration on the SWMP to additional stakeholders, including in health care, education, and climate and environmental justice.

Response 8. DSNY recognizes the value of cross-departmental and interagency collaboration. DSNY collaborates with City agencies and mayoral offices, including NYCDEP, NYCDOT, Parks, NYCPS, NYCHA, MOER, MOCEJ, and others to implement and improve waste management practices in the city. DSNY also appreciates working with elected officials, including City Council members, borough leaders, and community groups and organizations. Moving forward, DSNY will continue to collaborate with the NYC Department of Health and Mental Hygiene and New York City libraries.

DSNY developed *SWMP26* with consideration of the following State and City planning documents:

- DEC's *2023 New York State Solid Waste Management Plan*
- DSNY's 1992 and 2006 Comprehensive Solid Waste Management Plans
- *PlaNYC*, the City's sustainability blueprint
- DEP's *Energy and Carbon Neutrality Plan*
- DEP's *Biosolids Beneficial Use Plan*
- MOFP's *Food Forward NYC, A 10-year Food Policy Plan*
- DCAS's *Clean Fleet Transition Plan*
- DCP's *NYC Industrial Plan*
- MOCEJ's *EJNYC: A Study of Environmental Justice Issues in New York City*

DSNY also referenced the following plans for data and information: EDC's Green Economy Action Plan, Freshkills Park Alliance's The Park Plan, and DSNY's Zero Waste Plan.

Detailed Comments

The SWMP lists the agency partners in creating the plan. Given the health impacts of solid waste the omission of health agencies is notable. To address health impacts ... the Department of Sanitation must engage with the health department. (Bialik)

Collaboration must be a driving factor. Cross departmental and inter agency collaboration must be taken the distance. Increased funding for local waste diversion operators, such as community composting, redemption, and reuse centers, will save the taxpayers money. (Coyne)

Waste prevention requires collaboration—there needs to be meaningful engagement and development of shared initiatives with other city entities such as DOE [NYCPS], CUNY, SUNY, EDC, Library systems, and The Trust for Governors Island ... Consider working with NYC Libraries to support expansion of lending beyond books, for example tools, musical instruments etc. (CZWD)

We urge DSNY to align its waste planning efforts with other city and state initiatives, including (but not limited to) the *NYS SWMP*, the development of the *NYC Environmental Justice for All Plan*, the *NYC Urban Forest Plan*, and any future PlaNYC initiatives. (NYLCV)

Comment 9. Summary: The plan should include longer-term planning beyond the 10-year SWMP period.

Response 9. DSNY is required by New York State to develop a local solid waste management plan for a 10-year planning period with biennial updates (6 NYCRR Part 366). DSNY acknowledges the importance of a forward-thinking and agile approach to waste management. To understand changes to the municipal waste stream and trends in waste generation, DSNY evaluates waste generated by the residential and commercial sectors using waste characterization studies. The next residential waste characterization study is scheduled for 2028, while the next commercial waste characterization study is scheduled for 2032. Additionally, DSNY sees value in collaborating and communicating with other Planning Units in New York State and in the Northeast to identify solutions to waste management. DSNY engages with other Planning Units to identify pathways for waste reduction and recycling. For example, DSNY has historically collaborated with the Town of Brookhaven on tire recycling.

DSNY is continuously developing and implementing programs to support improved waste management based on the most recent available data. As part of *SWMP26*, DSNY is planning for emerging and growing waste streams. For example, **Strategy 105** is to support New York State EPR initiatives and identify opportunities to support photovoltaic (PV) module (solar panel) recycling in City planning and programs.

Additionally, DSNY manages waste transfer stations and contracts with multiple waste disposal vendors and recycling processors with excess and emergency capacity to support resilience in the management of MSW.

New York City is one of many Planning Units in New York State, and DSNY engages with other Planning Units to identify opportunities for improved waste management and achieve shared goals in the short and long term.

Detailed Comments

It would be wise for the Department of Sanitation to be forward thinking and agile in the decade to come. In the last decade or so, we saw the rise of the digital media and the decline of print media. Newspapers and magazines once filled city litter baskets and now they are all but obsolete. Instead, there has been an explosion of eCommerce which has led to a meaningful increase in cardboard and other packaging materials. It stands to reason that A.I. will have a meaningful impact on our material world in the coming decade. (Coyne)

I would like to see more robust planning for regional and local waste solutions that support the triple bottom line: People, Planet, and Tax Payer Savings. The world is facing a solid waste crisis, the next decade must be a decade of action. DSNY would be wise to re evaluate the core tenants of the department's mission to align more closely with the Sustainable Development Goals issued by the United Nations Environment Programme.⁴ (Coyne)

Begin longer-term planning—with just a ten-year horizon for *SWMP26*, planning should begin immediately for when current disposal options, e.g., both landfills and waste-to-energy facilities become less available to the city, creating both environmental and financial pressures. The City cannot be caught unprepared, as it was in the late 1980's when commercial waste was priced out of in-city disposal, and in 2001 with the sudden closure of the Fresh Kills landfill. A broader regional approach must be part of that planning—the city's requirements and situation are not unique but are under active consideration by neighboring communities and states. That planning should

anticipate the development of new regulatory schemes intended to support zero waste goals, such as extended producer responsibility, that will significantly impact the city's existing systems. (GS)

Comment 10. SWMP lacks innovation, urgency, and community engagement. (FABSCRAP)

The *2026 Solid Waste Management Plan*, despite its title, does not actually plan for how this central task will be accomplished. While it discusses a wide array of initiatives—from circular-economy roundtables to expanded nonprofit partnerships for textile and used-goods recovery—it offers no coherent strategy for reversing decades of stagnation in curbside and containerized capture and diversion rates for paper and MGP. It also appears naïve and under-informed about the realistic future of organics capture and diversion, given public reporting to date and an over-reliance on enforcement as a substitute for effective outreach. (MacBride)

Response 10. *SWMP26* provides a framework for waste management in New York City over the 2026–2036 planning period. DSNY believes that the programming presented in *SWMP26* represents a robust and interconnected effort to expand opportunities for reduction, diversion, and management of waste. Innovation is necessary to accomplish the goals set forth in *SWMP26*. Examples of innovation in proposed strategies include the following:

Strategy 17: Research, report on, and consider incentive-based policies as mechanisms to increase diversion, reduce single-use items, and minimize toxicity in New York City waste streams.

Strategy 25: Explore innovations in collection equipment and operations to improve source-separated organics quality.

Strategy 99: Advance research and identify infrastructure for reuse and remanufacturing.

Strategy 102: Explore the use of recycled tire rubber in infrastructure, including through challenge-based procurement.

Strategy 105: Support New York State EPR initiatives and identify opportunities to support photovoltaic module (solar panel) recycling in City planning and programs.

DSNY has already started working with other City agencies to identify opportunities to collaborate and implement these and other strategies. DSNY also recognizes that moving beyond existing waste diversion participation approaches is essential to encouraging more residents, institutions, and businesses to participate in resource recovery locally. To this end, DSNY looks forward to integrating accessible and inclusive education and outreach strategies to support waste reduction and diversion across waste streams.

SWMP26 anticipates growth in organics capture rate (percent of a material recovered of the estimated amount of material generated) and diversion rate (the percentage of all waste that is diverted away from disposal through recycling, composting, or other beneficial use). Compared to October and December 2024, DSNY-managed organics diversion increased by nearly 70% in that same period in 2025. This suggests that as the program becomes more established, the quantity of organics captured will continue to increase. Although enforcement may not be a consistently appropriate tactic to increase participation in diversion initiatives, the curbside and containerized organics program experienced a marked increase in diversion during the enforcement period in spring 2025.

Comment 11. Summary: New York City should establish a Department/Office of Circularity to advance development of New York City's circular economy.

Response 11. DSNY acknowledges the recommendation to establish a new office or agency to advance circularity within New York City, within DSNY, as an independent City entity, or as a Deputy Commissioner for Waste Prevention, Composting, and Sustainability. This recommendation will be taken under advisement. DSNY would note existing resources that are aligned with this recommendation, including DSNY's donateNYC program in the Division of Resource Recovery and New York City Materials for the Arts hosted by the New York City Department of Cultural Affairs. **SWMP26 Initiative 1.7**, convene New York City's circular economy stakeholders, also outlines strategies to promote a local circular economy through collaboration among community organizations, commercial enterprises, and City agencies and officials.

Detailed Comments

[The NYC Department of Circularity] could be managed under DSNY or another city agency. These ideas are both visionary and forward-thinking, but also traditional ... Benefits: Reduction of bulk of trash; minimizes and diverts toxic material; establishes infrastructure for reuse and repair through a network of repair clinics; offloads the job of promotion and marketing out of DSNY and substantially increases building outreach and ultimately increases recycling; creates jobs and internships, such as carpentry, electrical repair, fashion design, sewing and repair, furniture design and repair, artists, sales and marketing; creates networks of creatives to do this work; uses retired experts to train next generation. (E. Cooper)

[Ideas related to the proposed NYC Department of Circularity]: Establish a committee/brain trust to research and come up with further ideas. (E. Cooper)

Another great idea from the SWMP testimony: NYC to create a new office to promote sustainability, with offerings like multiple workshops in each borough where materials and items like metal, electronics, and textiles/clothing can be separated and reused by the public before carting them to a recycling center. (Herdan)

I believe that all Waste Prevention and Reuse Programs should be carved out of the DSNY and moved into a dedicated Office (or Department) of Circularity. A dedicated Office of Circularity would provide the leadership, stability, and vision needed to meaningfully scale waste prevention and reuse across New York City. It would ensure that these programs no longer "get lost" within a much larger agency and that they receive the long-term investment they require. This Office would be taking circularity from an abstract buzzword to a set of concrete practices and serving as a model for other cities to replicate. It would divert from landfills and incinerators, recirculate items, build community, and create local green jobs. (Sacks)

[Textile reduction] is a team effort that begs to create a city-wide Department of Circularity. (Silbermann)

Knowing that both incineration and landfill cause pollution and pain for communities in which they are sited, a major effort should be put into place to DRASTICALLY REDUCE the amount of trash and toxic material that goes to any of these facilities. Reduction will have multiple benefits to city budget, environment, and general economics. How can we do this in a scalable way? Focus on reuseable, repairable, shareable, recyclable items, especially bulk items, that are now disposed of

as waste. Much of it is not waste. I strongly encourage DSNY, City Council and Mayor Mamdani to seriously explore the creation of a new [NYC Department of Circularity]. (E. Cooper)

Add commitments to prioritize composting within the Department's organizational structure by appointing a separate Deputy Commissioner for Waste Prevention, Composting and Sustainability (NRDC)

Comment 12. Summary: Littering is a major problem in New York City. Local and national attitudes towards waste and littering need to change.

Response 12. DSNY recognizes the volume of waste generated by New York City residents, institutions, and businesses is high. On average, New York City residents produce 3.5 lbs/person/day of waste; by comparison, New York State residents (including New York City residents) produce 4.1 lbs/person/day, based on data presented in the *New York State Solid Waste Management Plan of 2023*. DSNY strives to keep New York City clean, safe, and healthy by collecting, recycling, and disposing of waste, cleaning streets, and addressing illegal dumping. DSNY has invested in cleaning programs (public spaces, litter baskets, highway, graffiti) and one of the benefits of the citywide waste containerization initiative is the anticipated reduction in litter and improvement in street cleanliness. Information about these programs, including reports, and ways for New Yorkers to participate and report issues is available on DSNY's website:

<https://www.nyc.gov/site/dsny/what-we-do/cleaning.page>

DSNY appreciates the interest and concerns associated with our waste management systems and agrees on the potential of education and outreach to inform and engage residents, institutions, businesses, and other stakeholders in waste diversion and to support changes to disposal habits. *SWMP26* Education and Outreach Program aims to increase the accessibility and reach of public outreach material in collaboration with community groups, partners, and elected officials.

SWMP26 includes strategies for waste reduction and diversion in the Waste Prevention and Reuse Program, Organics Diversion and Recovery Program, and Residential and Institutional Recycling Program. Further, in addition to DSNY's current hazardous waste collection at special waste drop-off locations and special waste events, **Initiative 7.1** will advance special waste recovery and Extended Producer Responsibility policies and **Initiative 7.2** will expand community events and centers for special waste recovery as part of the Special Waste Program.

Detailed Comments

I am disappointed, but beyond that, I am baffled by the tendency of New Yorkers to dump and litter in our public spaces. I have spent extended amounts of time in other densely populated communities within New York State, and beyond, where this behavior is not an issue. In NYC, we need a cultural reset with respect to the way we think about the day-to-day littering that takes place ... (Boyce-Charles)

Garbage is a part of the NYC landscape. It is everywhere: on the sidewalk, in the gutters with the rain, clogging the street drains, then into our waterways, in birds' nests ... everywhere. (Gorman)

I am highly concerned about the local and national problem of our waste. Our waste is TOXIC; it contains many known toxins, including PFAS chemicals, radioactive chemicals, and pharmaceuticals, in part due to human and animal waste. (Herdan)

As a society we generate a tremendous amount of waste. Fortunately, in recent years more has been done to increase recycling and to get residents and schools to separate organics for collection. We need to get more people to "do the right things". (Queens Community Board 5)

I also want to see more waste receptacles. I do not think that it is acceptable to walk multiple blocks without seeing a waste receptacle. All of our community members deserve it, and we are here to work with you. (McGillivray)

Flimsy public trash cans, if any at all, especially around my living area of 30th and 31st Aves. If we want people to dispose of their trash properly, proper receptacles should be offered and regularly serviced. (Gorman)

The City must be more consistent with its placement and monitoring of public garbage cans. Cans that reinforce responsible disposal (trash vs. recyclables) must be more accessible and clearly labeled; and they must be emptied regularly. This is especially an issue near/around the LIRR train stations where people tend to dump. (Boyce-Charles)

Funding/Investment

Comment 13. Summary: SWMP26 should include specific proposals for city, state, and other funding to increase investment in the proposed programs.

Response 13. DSNY will continue to work collaboratively with City oversight to pursue funding for all of its programming, including SWMP26 initiatives. DSNY receives state funding annually for many programs through grants and existing EPR programs. DSNY will work with stakeholders to better understand the value potential of the city's waste streams and identify opportunities to increase the recovery of materials and products in a way that provides economic benefits to the city. Several SWMP26 strategies, including convening stakeholder groups, evaluating new technologies, planning for organics capacity, and increasing overall diversion, support an economically sustainable solid waste management system. The packaging EPR program is the best opportunity to create dedicated funding for diversion programs, especially given the general lack of federal and State investment in local waste management infrastructure and diversion programs. DSNY agrees that more can be done with additional, dedicated funding.

Detailed Comments

The newly-adopted [NYC Industrial Plan's] mention of [industry development initiatives for the materials recovery sector] opportunity should be supported with a significant investment of at least \$50 million. It has been decades since the city considered and made significant investments in recycling-related infrastructure and businesses. (GS)

Invest in organics processing, reuse facilities, and repair infrastructure. (MSWAB)

The *Draft 2026 SWMP* does not call or plan for major capital projects to reduce greenhouse gas emissions, reduce local air and water pollution, or to more fairly distribute the burdens of solid waste infrastructure. We urge that DSNY ... include specific capital investments in the *2026 SWMP* that would advance these overarching objectives and fulfill the waste equity promises of the current SWMP. (NYLPI)

The large expenditure that the City has made on recycling and organics infrastructure won't by itself increase the diversion rate away from costly and environmentally damaging export of our resources to be burned and buried. It is false economy to spend half a billion dollars per year to export so much of our recyclables and organics (as well as reusable and repairable consumer goods left at curbside). Depriving us of the local jobs possible by processing the resources locally, and not receiving revenues from the sale of the commodities and repaired goods that get burned and buried. (Clarke)

Examine investment models from other states, provinces, and cities, including those supporting development through grants, loans, and regulations of recycling-related industrial parks and other types of collection, processing, and market development infrastructure. (GS)

NYC needs to increase the funds and the effort towards our goals to transition to sustainable methods. (Herdan)

Uplifting *A People's SWMP*,⁵ ICC recommends the following: The *2026 SWMP* must commit the Department of Sanitation to allocating additional monies for investments in recycling and waste programs, taking advantage of City and State funding sources. (ICC)

New York City claims the title of having the highest income inequality in the country ... This inequity is racially stratified. The *Solid Waste Management Plan* is an important opportunity to invest in equity in the city, both economically and environmentally, by making equitable investing an explicit objective of the ten-year plan. This could be done by assessing the quality and distribution of access to resources like land and funding for collecting and processing organics and other valuable reuse materials, and fostering not only employment but local businesses opportunities with city contracts. The State's SWMP goal #4.2.9 (page 47) indicates that the State will "provide financial assistance for local, nonprofit, and small-scale organics collection and processing operations" starting next year. This means that the City could use its own SWMP to advocate that state dollars reach neighborhoods and composters equitably in our city. The city can support and grow our already diverse ecosystem of local operations through public-private partnerships and allocate resources such as low-cost land use contracts, while also ensuring that small operators receive information and support to access State funding opportunities. (Jenkins)

The draft plan doesn't even appear to ask for greater funding. Who doesn't ask for more money? (Leonard)

There must be stable and sufficient funding compared with model cities. If measured progress lags, more funding or improved programs are indicated. The Recycling Partnership states the best practice for funding education and outreach is \$10/household/year. (MSWAB)

We strongly recommend that the *2026 SWMP* include explicit proposals for state and local legislation that would generate stable and meaningful long-term funding sources for critical capital and operating expenses, such as: 1. Implementation of the State's long-delayed Cap and Invest Program estimated to generate billions annually for climate and resiliency projects; 2. Expansion of extended producer responsibility programs to include packaging and other major components of the residential and commercial waste stream; 3. A statewide surcharge on disposed waste, as outlined in the *New York State Solid Waste Management Plan*; 4. Interim state funding via an expansion of the Sustainable Futures Fund to at least \$3 billion annually. (NYLPI)

Comment 14. The plan presents itself as an ambitious, forward-looking document. It opens with a tone of optimism, asserting that the City has “pivoted from a linear to a circular economy,” and positioning the Department of Sanitation (DSNY) as being at the forefront of innovation and as a “leader in urban resource recovery” ... implying that New York City has already entered a new mode of waste management aligned with long-standing frameworks variously described as “integrated waste management,” “source reduction,” “zero waste,” or, in this report, “resource recovery.” The latter term is especially expansive, typically encompassing not only material recovery but also the recovery of energy and fuels, and therefore broadening what counts as success under a circular framing. New York City’s current waste management system operates well, but it does not yet reflect the transformation implied by this framing. Claims that the system has already entered a new, circular phase set expectations that the substance of the plan does not consistently meet—particularly in the areas of outreach, education, accountability, and the maximization of diversion from DSNY-managed waste streams. (MacBride)

Response 14. DSNY does not wish to misrepresent the state of waste management in New York City and recognizes that transitioning to a circular economy requires time, innovation, dedication, and participation in DSNY programming. Although New York City is in the process of shifting to a circular economy with a focus on resource recovery, work is still required to achieve this. The *SWMP26 Executive Summary* states:

Shifts in the past two decades ... mark progress in the transformation of waste management from a linear to a circular economy model ... Building on these existing programs and infrastructure, the *SWMP26* initiatives aim to establish DSNY as a leader in the circular economy and urban resource recovery. Over the next decade and beyond, DSNY will significantly reduce the tonnage of waste generated and increase the percentage of waste diverted by launching programs focused on residential waste prevention, reuse, and repair while expanding current residential organics, recycling, and donation programs.

It should be noted that DSNY provides New Yorkers with programs to divert up to 75% of their waste. Education, outreach, enforcement, and accessibility of programs will help New Yorkers participate in these programs and realize the transition to a circular economy. DSNY has identified strategies to advance this objective in the Waste Prevention and Reuse Program (1, 2, 7, 13, 14), Organics Diversion and Recovery Program (26, 27), Residential and Institutional Recycling Program (56, 57, 65, 68, 70), Special Waste Program (108, 109), and Education and Outreach Program (110–124).

Comment 15. Promote development of “eco-industrial parks”—places with processing and interchange of post-consumer materials. (CZWD)

We also encourage NYC to add beneficial use determinations (“BUD”) pathways that enable safe market uptake of pilot outputs, consistent with the Plan’s emphasis on beneficial use. (Decarb Energy Partners)

Support revisions to the New York State Solid Waste Management Act to strengthen planning and funding. (MSWAB)

Response 15. DSNY will collaborate with DEC, which administers the statewide BUD program, as well as with EDC and DCP on Industrial Business Zones as part of the Construction & Demolition Waste

Program. DSNY continuously monitors state legislation as part of citywide intergovernmental affairs.

Comment 16. Summary: *SWMP26* should include a commitment to transparency in datasets used to develop the SWMP as well as in reporting on program deliverables.

Response 16. DSNY collects and maintains data on numerous waste streams from the residential and institutional sectors. DSNY also obtains data on commercial waste from private waste haulers and transfer stations. This data is compiled and published on the DSNY website or on OpenDataNYC and includes Annual New York City Municipal Refuse and Recycling Statistics (LL40 Reports); New York City Curbside and Containerized Municipal Refuse and Recycling Statistics by Borough and District; DSNY Collection and Diversion Fiscal-Year-to-Date; DSNY Monthly Curbside Collection; and SweepNYC Metrics. DSNY also publishes waste characterization studies, zero waste reports, SWMP Biennial Reports, and annual reports on the implementation of New York City's waste equity law.

With the implementation of *SWMP26*, DSNY aims to improve data collection and reporting on the benefits of reuse (**Initiative 1.5**), annually report on Commercial Waste Zones pursuant to Local Law 199 of 2019 (**Strategy 83**), monitor the capture rate and diversion of recyclables in Commercial Waste Zones (**Strategy 85**), and improve data quality as part of the Commercial and Industrial Waste Program (**Initiative 5.4**). With these initiatives and strategies, DSNY looks forward to improving program evaluation to optimize waste reduction and diversion. DSNY will conduct a residential waste characterization study no later than January 31, 2028, and a commercial waste characterization study, including construction and demolition debris, no later than January 31, 2032, in accordance with **Strategy 18** (continue to conduct waste characterization studies, per LL14 of 2025, and use the results of those studies to inform policy development) and **Strategy 89** (complete a commercial waste characterization study per LL14 of 2025). DSNY anticipates conducting waste characterization studies to evaluate specific programs, such as containerization, in the interim. In the upcoming planning period, DSNY looks forward to working with elected officials to identify achievable waste reduction and diversion goals that are well-resourced and collaborative.

Detailed Comments

Access to the datasets DSNY has used to prepare the SWMP will be immensely helpful for the public, academia and organizations seeking to understand and support improved data management. Please ensure that full access to data sources for residential, commercial and C&D waste tonnages, both current and proposed, are made available [through] OpenData. (CZWD)

Evaluation, data transparency, and accountability are insufficient. The Draft lacks a defined program-evaluation framework, relies on datasets that have lost historical comparability, and does not commit to regular public reporting of capture rates, diversion rates, or corrective actions when targets are missed. (Environmental Coalition)

Data is lacking on the number of full-time equivalent (FTE) staff assigned to recycling and organics outreach for a city of New York's size. DSNY public statements emphasize headline numbers without context, most recently citing 800,000 doors knocked during the organics rollout— a figure that appears to correspond roughly to the number of one- and two-family homes in the city. While such numbers sound impressive, they resist further inquiry. What measurable effect has this

intervention produced? Is it part of a coherent, sustained, and adequately scaled strategy to improve organics capture over time, or a one-time blitz designed primarily to say “this is what we did?” (MacBride)

Establish transparent, annual reporting of all studies, pilots, and zero waste programs, and public online dashboards. (MSWAB)

Does DSNY have a timeline to initiate a waste characterization study for commercial trade waste and/or C&D? (Wood)

The 2026 SWMP should include plans to complete a comprehensive waste characterization study (including construction and demolition waste) as soon as possible. Current law gives DSNY until 2032 to complete a study, which is far too late to gain a basic understanding of this massive waste stream. (NYLPI)

Comment 17. Summary: Incorporate *A People’s SWMP* into SWMP26.

Response 17. *Draft SWMP26*, published in October 2025, included a number of initiatives and strategies that align with Transform Don’t Trash’s *A People’s SWMP*. In response to public comments, DSNY revised SWMP26 in alignment with *A People’s SWMP*, as follows (new or revised text is italicized):

DSNY updated **Strategy 71** to read: “Continue to assess the viability of accepting commercial waste at City-owned transfer stations, *in alignment with the rollout of the Commercial Waste Zones Program.*”

Recommendations #1 and #3 of *A People’s SWMP* ask DSNY to commit to using Marine Transfer Stations (specifically West 59th Street Marine Transfer Station) for commercial waste and recycling. The SWMP does not commit to using Marine Transfer Stations for commercial waste, as this would require a more detailed analysis. The updated strategy requires DSNY to leverage findings and data from the Commercial Waste Zones Program to inform the use of Marine Transfer Stations for commercial material, providing a clearer path and timeline forward.

DSNY revised **Strategy 69** from “Prioritize planning for changes to Reworld Essex incineration capacity while also evaluating options for other contracts, starting with the contracts that would expire first” to “Prioritize planning *for the expiration of the contracted capacity at the Reworld Essex, NJ incinerator* while also evaluating options for other disposal contracts, starting with the contracts that would expire first.”

DSNY revised **Strategy 84** to: “Work with New York City Council to expand organics separation requirements to include all businesses *and prioritize donation*”, which supports *A People’s SWMP* Recommendation #18: “The 2026 SWMP should commit New York City to supporting comprehensive legislation that facilitates the donation of the tens of thousands of tons of edible, unsold and excess food annually to programs serving food-insecure New York City residents.”

Also included in SWMP26 is **Strategy 46**, “Work to increase the amount of food donated for food-insecure New Yorkers by commercial generators of food waste,” which was included in the *Draft SWMP26*, published in October 2025.

DSNY will continue to engage and collaborate with stakeholders during SWMP26 implementation.

Detailed Comments

ICC encourages DSNY to take the Transform Don't Trash NYC Coalition's lead and implement *A People's SWMP: 30 Recommendations For A Solid Waste System That Is Healthy And Safe For All New Yorkers*.⁵ (ICC)

The Transform Don't Trash NYC coalition recently published *A People's SWMP*⁵ including 30 community-driven recommendations for the 2026 plan, and we look forward to continued discussion of these initiatives with DSNY, the Mamdani administration, and the City Council. (NYLPI)

TDT coalition developed *A People's SWMP* report⁵ which identifies a list of 30 recommendations for inclusion in the *2026 SWMP* based on input gathered from impacted community members across the city, solid waste experts and research into municipalities across the United States. We request that this report in its entirety be incorporated into the record. (TDT)

Comment 18. Quick little thing to look at and possibly edit for a bit more accuracy: On page 3—section 2, second paragraph of current conditions assessment—in the executive summary ... Measurements of “a third” = 33% , and half is 50% ... that'd be around 83% to the average person reading the report ... so when you add in that 40% for commercial ... that'd be “around” ... 123%. As it's written is kinda pushing the margins on “around” and “nearly” ... My recommendation is to change it to be more accurate in descriptive and factual representation. (Grayson)

Response 18. Comment noted and changes were made to improve accuracy. In 2023, 36% of publicly managed waste was collected from residents. The remainder of publicly managed waste was generated by a combination of the private and public sectors, and includes biosolids from wastewater treatment, recycled asphalt pavement and concrete aggregate, and yard waste from private contractors. In 2023, 38% of the city's waste was classified as commercial/industrial waste, which includes most C&D debris and fill, scrap metal and automotive waste, and privately managed special waste, such as used oil and medical waste. C&D debris and fill (soil and rock) account for 40% of the city's waste generation. Seventeen percent was classified as commercial/business waste, which includes MSW; privately managed source-separated organics; and commercial recycling of MGP (metal, glass, and plastic), paper, and mixed recyclables.

Zero Waste and CLCPA

Comment 19. Summary: *SWMP26* needs to include concrete steps to create and implement a zero waste plan as required by the Zero Waste Act of 2023.

Response 19. The Zero Waste Act of 2023 states that:

b. The department [DSNY] shall establish a goal of diverting citywide-generated recyclable waste by 100 percent by calendar year 2030 from landfills or incinerators. c. If the department determines that the citywide-generated recyclable waste diversion goal established pursuant to subdivision b of this section is not feasible despite the best efforts of city government, the department shall report such findings and make recommendation with respect to policies, programs, and actions that may be undertaken to achieve such

diversion, as part of the department's annual zero waste report required pursuant to subdivision b of section 16 -316.5.

In accordance with the Zero Waste Act of 2023, DSNY has prepared a Zero Waste Plan⁶ and published Zero Waste Reports for fiscal years 2024 and 2025. DSNY is also in full compliance with Zero Waste Act requirements for citywide curbside composting, community recycling events in every district, and textile drop-off options in every borough. DSNY will continue to meet the requirements and report on zero waste in accordance with Local Laws 85–89.

DSNY acknowledges the climate, health, and environmental justice benefits of waste reduction and diversion. Traditional recycling and compostable materials make up more than two-thirds of New York City's waste. If every New Yorker composted and recycled perfectly, the curbside diversion rate would be 68%. While achieving "Zero Waste" by 2030 may not be attainable, by focusing efforts on this largest part of the waste stream, New York City can continue to see great improvements in waste diversion. DSNY developed *SWMP26* programs to meaningfully reduce waste generation and increase waste diversion from all waste streams.

Based on the *2023 Waste Characterization Study*, DSNY's programs already provide New Yorkers with opportunities to divert up to 75% of their waste through curbside collection, special drop-off and pick-up services, and community recycling events. *SWMP26* is aimed at reducing and diverting waste, and DSNY will continue to report on the amounts diverted and the diversion rates. As part of *SWMP26 Strategy 34*, DSNY will initiate the organics processing capacity stakeholder process inclusive of various scales of processing and transportation modes. The City is clear in its intention to expand composting capacity citywide and to maximally divert waste from landfills and incinerators.

SWMP26 prioritizes waste reduction through donation, lending, reuse, and repair initiatives and strives to increase diversion of all materials that can be recycled or recovered. *SWMP26* includes an Education and Outreach Program in support of those efforts. The City's forthcoming Environmental Justice Plan includes recommendations to reduce organic waste by adopting best practices for resource recovery programs and prioritizing reduction, followed by rescue (donation), and finally recycling through composting and/or anaerobic digestion. Regarding the comment about fines for noncompliance with the mandatory Citywide Residential Organics Program, DSNY emphasizes that enforcement has resumed in earnest as of April 2026.

Detailed Comments

There is no waste in nature; waste also known as "discarded materials" (my preferred terminology) is a product of human activity. It is also a sign of inefficiency. New York is an economic engine of the state, country, and globe; with this economic activity comes significant waste output due to our current extractive and linear economic model of "take make-waste." In the next decade, we need to bend our economy towards a more circular economy.⁷ (Coyne)

It is super important to do what you can to increase composting participation rates and reduce single plastic use. We have to actually reduce consumption to get to a zero waste world. (Ezrachi)

DSNY has the opportunity to make its 2015 sustainability plan's zero-waste targets a reality. (ICC)

Local Law 87 of 2023 requires DSNY to create a zero waste plan and to increase waste diversion ... with a goal of diverting all recyclable and organic waste by 2030. However, I don't see many concrete actions to achieve Zero Waste in the Draft 2026 SWMP. (Latham)

Enforce the Local Law 86 of 2023, which has a goal of ending landfilling or incineration of recyclables and organics by 2030. (MSWAB)

Local law requires DSNY to meet rigorous waste diversion goals within the next local solid waste planning period. Notably, Local Laws 85 and 86 of 2023 establish a goal of diverting 100% of recyclable materials from landfills and incinerators by 2030, and require planning to maximize the use of composting as a method of recycling organic waste during the next SWMP. (NYC EJA)

One of NYLCV's top policy priorities is achieving our zero waste by 2030 goal to not only curb our greenhouse gas emissions but to send less waste to landfills, which are disproportionately located in low income communities and communities of color. The higher rates of pollution from landfills and incinerators in these communities cause disproportionately higher cases of asthma, cancer, and other health issues and compound already existing environmental and racial inequities. Due to these environmental injustices, the City needs to do everything in its power to continue moving towards organic waste recycling in order to further environmental justice, reduce emissions, improve our quality of life, and get us on track with our zero waste reduction goals. (NYLCV)

There are major waste-related laws and goals that DSNY still needs to fully implement and ramp up outreach and education efforts for, including (but not limited to) the Commercial Waste Zones law, the Zero Waste Act of 2023, the zero waste goals outlined in PlaNYC: Getting Sustainability Done,⁸ and increasing the city's recycling rates through education, outreach, and enforcement. (NYLCV)

Our city needs to move towards a system where we reduce waste in the first place in order to minimize the burden of waste on environmental justice communities (whether in New York City or beyond), and a system where resources are reused and recovered. (NYLCV)

NYLCV urges DSNY to continue implementing and funding [the Zero Waste Act of 2023, which included LL85, LL86, LL87, LL88, and LL89] in order to increase waste diversion rates and bring us closer to zero waste by 2030. (NYLCV-13) The City has been behind schedule on meeting our zero waste goal of reducing the amount of waste we send to landfills 90% by 2030, so it is imperative that the City take bold action to drastically reduce waste over the next several years. Investing in recycling, composting, and other zero waste initiatives and enforcement is not only important for furthering environmental justice, improving the environment, and fighting climate change, but also creates green jobs. (NYLCV)

The City's new ten-year solid waste management plan is of critical importance to public health, to our environment, and to our economy. Greenhouse gas emissions from the solid waste sector are estimated to make up 12% of New York State's economy-wide emissions—a share roughly equivalent to the state's entire electricity generation sector. Thankfully, waste policy remains largely within municipal and state control despite an unprecedented federal assault on climate resilience, renewable energy, and infrastructure funding. To reduce the negative impacts and expense of solid waste disposal over the next decade, the SWMP should function as a blueprint for innovation, [expand] existing programs and infrastructure, and must lay out a clear pathway to achieving the

goal of diverting 100% of reusable and recyclable waste from landfills and incinerators by 2030, set by the Zero Waste Act of 2023. (NYLPI)

Troublingly, the *Draft 2026 SWMP* includes estimates of citywide waste generation and diversion showing that in sum, the proposed programs are not nearly robust enough to achieve the goal of diverting 100% of recyclable materials from landfills set by the Zero Waste Act (Local Law 87 of 2023) and the goal of a 51% diversion rate for municipal solid waste set by the State's Solid Waste Management Plan. We therefore stress that the 2026 SWMP must envision a set of policies, long-term budgets, public education campaigns, and enforcement mechanisms that would achieve the City and State's ambitious and necessary waste reduction and greenhouse gas emissions reduction goals. (NYLPI)

Unfortunately, DSNY has used creative means to get around compliance with the Zero Waste Act (2023 City Council legislation meant to increase diversion). These laws require DSNY to establish at least one community recycling center in each borough and at least 30 organic waste drop-off sites citywide, with at least three in each borough ... The Act also established the permanent curbside residential organics collection program and required penalties for non-compliance beginning in April 2025. The City implemented such penalties, quickly rolled them back, and has yet to reinstate them, removing the incentive for residents and property managers to participate in the program. The 2026 SWMP should commit DSNY to good faith compliance with all tenets of the Zero Waste Act. (Reynoso)

DSNY should not continue only collecting, containing and "disposing of" our waste at great expense in every way. We need to start locally to process our waste as follows: Food scraps and organics: increase separated food scraps to at least 50% within five years, and then up towards 100%. Process food and organics locally into high-quality compost, starting in multiple NYC Parks in each borough ... Metal, glass, and paper—increase separated recyclables to at least 50% within 5 years, and then up towards 100%. (Herdan)

Comment 20. Adopt EPA's product-based [waste characterization] method that: [1] Identifies prevention, reuse, recycling, and composting opportunities in this order of preference. Disposal contracts should not interfere with this zero waste system; [2] Prioritizes upstream solutions where environmental benefits are greatest; [3] Conducts regular characterization and reuse potential studies to inform policy and investment ... Using a recycling/organics characterization as DSNY has done since 1989 only helps design recycling and organics programs/infrastructure. Opportunities for reuse and prevention methods are not shown using the waste characterization method that DSNY has chosen ... Prevention and reuse should be prioritized as they deliver the greatest benefits by reducing upstream environmental impacts ... (MSWAB)

Response 20. *SWMP26* prioritizes waste prevention and reuse in alignment with the EPA's Waste Management Hierarchy. As part of **Strategy 18** (continue to conduct waste characterization studies, per Local Law 14 of 2025, and use the results of those studies to inform policy development), and **Strategy 89** (complete a commercial waste characterization study per Local Law 14 of 2025), DSNY can consider a material-based approach to waste characterization.

Comment 21. New York City must be a key player in meeting our Climate Leadership and Community Protection Act (CLCPA) goals and addressing the waste crisis facing New York State at large. (Scovell) (Bargholz)

I am concerned that both scenarios of the Draft Plan—business as usual and the diversion programs scenario—do not appear to be fully aligned with the requirements of the Climate Leadership and Community Protection Act (CLCPA) or related State and City zero-waste mandates. The CLCPA treats waste combustion, including incineration and waste-to-energy, as a regulated greenhouse gas emission source and explicitly prohibits its use as an alternative compliance or offset mechanism. In addition, the CLCPA and the State’s Final Scoping Plan envision a significant reduction in disposal through landfilling and combustion, no new solid waste combustion capacity, and heightened scrutiny of existing facilities to ensure consistency with statewide emissions limits and protections for disadvantaged communities. Accordingly, clarification is needed as to how the Draft Plan will be brought into alignment with the CLCPA and the State’s Final Scoping Plan, including how reductions in disposal through landfilling and combustion are expected to occur over the plan’s timeframe in order to achieve the City’s zero-waste objectives, mandated in Local Law 86 of 2023 and related laws (85, 87, 88 and 89 of 2023). (Gallagher)

Response 21. The *CLCPA Scoping Plan* indicates that 12% of greenhouse gases (GHGs) are attributed to the waste sector in New York State. In developing *SWMP26*, DSNY worked to align the plan with the State goals and strategies outlined in the *CLCPA Scoping Plan* and *2023 New York State Solid Waste Management Plan (NYS SWMP)*. The *NYS SWMP* envisions an 85% reduction in landfilling and combustion by 2050. The *CLCPA Scoping Plan* envisions emissions reductions through increased diversion from landfills, emissions monitoring and leak reduction, and a shift to a circular economy by 2030. By 2050, the *Scoping Plan* envisions an 85% reduction in GHG emissions compared with 1990 levels. *SWMP26* aligns with these goals by supporting waste reduction, reuse, and recycling and the shift towards a circular economy model. Additionally, the landfilling of organic waste generates methane, which is a potent GHG. DSNY developed the Organics Diversion and Recovery Program, which will reduce GHG emissions.

Comment 22. We are supportive of the proposal in the *Draft 2026 SWMP* to study the feasibility of building a solar farm on the Edgemere Landfill in Far Rockaway. Given New York City’s pressing energy needs, increasing electricity costs, and overreliance on polluting and inefficient peaker plants, we urge that this project advance as soon as possible. We further urge that DSNY, the Department of Citywide Administrative Services, and MOCEJ consider partnering with the New York Power Authority’s (NYPA) to utilize this site for publicly owned renewable energy and offer discounted energy to surrounding low- and moderate- income communities. (NYLPI)

The *SWMP* should also include a plan to rapidly build utility-scale solar and battery storage on Fresh Kills landfill, by the far the largest city-owned open space at approximately 2,200 acres. Fresh Kills is near the Arthur Kill Generating Station, one of the City’s oldest, dirtiest, and most expensive power plants. Solar generation and storage near this plant would facilitate interconnection with the grid and could bring immediate health and economic benefits to nearby communities by reducing and ultimately ceasing reliance on inefficient peaker plants emitting NOx, particulate matter and other harmful air pollutants. Utilizing landfills for solar and storage facilities is also an opportunity to incorporate community dialogue and public education on environmental

justice, climate change, renewable energy and storage technologies, and the legacy of landfills and brownfields. (NYLPI)

Response 22. DSNY appreciates the support for studying the feasibility of developing a solar power installation on the Edgemere Landfill in Far Rockaway and acknowledges the request for expedition in this strategy. DCAS is working with NYPA to develop a feasibility study for Fresh Kills and already has a draft feasibility study completed for Edgemere Landfill. DSNY will also consider other renewable energy opportunities at Fresh Kills Landfill.

Comment 23. Summary: A circular economy is an investment in green jobs and other revenues.

Response 23. DSNY is implementing several local laws that support a circular economy, including Local Law 85 of 2023, for citywide curbside organics collection for all residents, and Local Law 88 of 2023, which requires DSNY to hold community reuse and recycling events in every Community District. DSNY is making additional strides in improving commercial waste diversion through the establishment of Commercial Waste Zones, which will improve oversight of commercial waste collection; improve enforcement of environmental, health, and safety standards; and incentivize recycling.

Over the next decade, *SWMP26* programs are projected to meaningfully reduce the amount of waste generated by launching programs focused on waste prevention, reuse, and repair. The Waste Prevention and Reuse Program includes several strategies to promote a circular economy, such as advancing reuse and repair programming at community reuse and recycling events (**Strategies 13 and 14**), promoting at least one pilot of reusable packaging (**Strategy 10**), and advancing textile reuse programs and reducing textile waste (**Initiative 1.1**).

Additionally, *SWMP26 Initiative 6.3* (include C&D waste in the circular economy) includes seven strategies (**Strategies 95-101**) to promote deconstruction, waste reduction, reuse, and recycling of C&D materials.

With a shift to a circular economy, work opportunities in this sector are projected to grow.⁹ City agencies, including DSNY, are also in the process of phasing in the Community Hiring Program, which offers opportunities to jobseekers who are low-income (Income-Based Community Hires) or live in economically disadvantaged communities (Residence-Based Community Hires).¹⁰

Detailed Comments

For all these initiatives, investing in our city's waste management system is an investment in green jobs and we urge DSNY to continue working towards a circular economy. (NYLCV)

NYLCV ... supports DSNY's efforts to prioritize a circular economy, which will not only help NYC achieve its zero waste goals but invest in green jobs. (NYLCV)

Recycling and composting create more jobs per ton than disposal. Municipal reuse systems create even higher employment and value through repair, resale, and redistribution. Redirecting export funds would stimulate local infrastructure and workforce development. [These actions can lead to the following] revenue opportunities: sale of more recyclables and compost; value recovery from reusable and repaired goods; reduced long-term disposal liabilities; increased tax revenues. (MSWAB)

These solutions [waste reduction, recycling, and composting] are not only better for our environment and public health, but also our economy. Recycling creates an average of nine times

more jobs than trash. Reuse creates up to 30 times more jobs. And composting creates at least twice as many jobs as landfills and four times as many jobs as incinerators. Nationwide, recycling and reuse activities account for 681,000 jobs and \$117 billion in economic activity. (Seneca Lake Guardian, Taylor)

- Comment 24.** Clarification is needed as to whether the City plans to measure and report annual progress in diversion attributable to each zero-waste initiative—across prevention, reuse, recycling, and composting—in order to ensure that commitments are being fulfilled and that progress toward stated goals is transparently tracked. (Gallagher)
- Response 24.** DSNY reports annually on waste reduction and reuse programming in the Zero Waste Report. The Zero Waste Report includes information on waste reduction, reuse, recycling, composting, and special and hazardous waste in compliance with the Zero Waste Act.
- Comment 25.** The production, transport, and disposal of this waste contributes to climate damage,¹¹ poses significant risks to the environment and to public health, drives inequities and environmental injustice,¹² creates significant cost burdens,¹³ and endangers workers.¹⁴ Because these impacts are inherent in the cycle of production and disposal, the only real solutions to this crisis are those that stop waste before it starts, commonly referred to as Zero Waste.¹⁵ ... At Just Zero, we believe that all people deserve Zero Waste solutions with zero climate-damaging emissions and zero toxic exposures. We prioritize an approach that empowers communities to pursue Zero Waste policies that build systemic solutions to divert, reduce, and eliminate waste without relying on toxic and climate-damaging practices such as landfilling, incineration, or the land application of toxic sewage sludge. Waste prevention, waste reduction, and reusing materials are core principles necessary for a transition to Zero Waste. DSNY has appropriately integrated these goals into the Draft Plan. (Just Zero)
- Response 25.** DSNY agrees that waste prevention, waste reduction, material reuse are appropriately integrated in *SWMP26* and acknowledges the effects of waste production, transport, and disposal on the environmental and public health. DSNY strives to reduce the quantity of waste generated and disposed by New York City to reduce the impacts on disadvantaged communities. DSNY supports worker safety, including reducing the risk of fires associated with rechargeable batteries through proper end-of-life management (**Strategy 104**), and waste collection practices, as demonstrated by Local Law 55, 56, and 57 of 2019 (see Attachment A: Local Laws Relevant to Waste Management for additional details).

Environmental Justice

- Comment 26. Summary:** The plan must do more to address environmental justice, which is an urgent issue in the city.
- Response 26.** Creating a more just waste management system is a major objective for DSNY. Your suggestions will help inform DSNY's continued participation in the development of the citywide *EJNYC Plan* and annual progress reporting (**Strategy 79**), as well as consideration of the distribution of environmental justice benefits in all *SWMP26* programs (**Strategy 80**). A key part of the plan for a more just waste management system is increasing diversion rates to reduce reliance on landfilling

and incineration. The plan has been developed with the objective of reducing waste and increasing diversion. Implementation of *SWMP26* is projected to result in 30.5% diversion rate for DSNY-managed municipal solid waste and 54.7% diversion rate for New York City commercial waste by 2036, as described in **Chapter 7: Waste Stream Projections**.

Detailed Comments

Ensure City Waste Policies Advance Environmental Justice: Here in New York, the air and noise pollution and quality-of-life problems triggered by the location of land-based waste transfer stations primarily in the South Bronx, North Brooklyn, and Southeast Queens are by now well-known. Less visible to New Yorkers, but no less problematic, have been the pollution impacts from out-of-city landfills and incinerators, which have also often dumped into already overburdened Black and brown neighborhoods. The *Draft SWMP* recognizes the reality of the environmental justice problems posed by waste handling in New York. It favorably references the city's environmental justice interagency working group, and the planning of the Mayor's Office of Climate and Environmental Justice, and the 2018 Waste Equity law, among other things. But in critical areas, the *Draft SWMP* does not go far enough in redressing long-running environmental injustices in the city's waste disposal programs. (NRDC)

I urge DSNY to move beyond maintaining the status quo and instead commit to piloting, funding, and scaling innovative diversion models—not only for a less trashy New York, but for meaningful economic and social development. ... the *Draft SWMP* is not just continuing business as usual—it is actively delaying meaningful impact. The plan relies on incremental improvements, long planning horizons, and seemingly no awareness of the current climate crisis we're in. Instead, it leans on language like "continue to explore," "evaluate opportunities," "build on existing programs," and "as capacity becomes available." What are you waiting for? Climate damage is already embedded in the systems we use every day. Delaying action doesn't slow harm; it locks it in. Systems that delay change are actively worsening outcomes. I urge DSNY to act with urgency—because every year we "continue to explore" disproportionately burdens Environmental Justice communities in our city, where waste infrastructure, truck traffic, pollution, and health impacts are already concentrated. (FABSCRAP)

We all know that sending our trash by truck and rail to other municipalities to be incinerated or dumped in a landfill is not environmentally sustainable, is not cost effective, is not a viable long-term solution, and most importantly, is not healthy for the residents of the communities that are having to deal with our garbage. (Latham)

While this plan speaks of a "Trash Revolution" and a shift toward a circular economy, we must be honest about what it really is. Today, New York City exports approximately 10,670 tons of waste every single day. Roughly 85% of that trash get containerized then travels by barge and long-distance rail to landfills in states like Virginia. In rural Sussex County Virginia, the Atlantic Waste Disposal landfill in Waverly, a community that is 83.5% non-white, is now one of the largest in the nation. Every day, it accepts up to 8,000 tons of refuse, one-third of which comes directly from New York City. In Amelia County, the Maplewood Landfill provides us with a staggering 1.4 million tons of reserve capacity every year. These communities have faced 8,000-gallon leachate spills into their wetlands and constant heavy truck traffic. Furthermore, research shows that 79% of the facilities we use are located in environmental justice communities, meaning we are effectively exporting our environmental burdens to marginalized populations across state lines. Virginia's

statewide landfill capacity is projected to be exhausted in just 20 years. With this current plan, we are not working towards solving our waste problem; we are simply consuming someone else's landscape until it is gone. This plan must be improved because New York City cannot "export its way out" of this crisis. Our own data shows that 75% of what we send to Virginia is actually divertible. New York City spends over \$500 million annually just to send our trash away. I am calling on the DSNY to stop prioritizing expensive export contracts that are destroying already overburdened communities and instead aggressively reinvest that funding into local diversion resources, specifically for textiles, organics, and paper, so that we stop treating rural Virginia and other states like it as New York's trash pile ... (Lindwall)

In 2018, the City Council passed my Waste Equity legislation, decreasing the amount of permitted waste capacity in three overburdened communities: North Brooklyn, the South Bronx, and Southeast Queens. According to the 2026 Draft, this "resulted in a decrease in material managed at affected private transfer stations by nearly 3,000 tons per day." (That is equivalent to about 214 fewer private waste trucks in these communities daily.) ... (Reynoso)

When your city reduces waste, it protects real families, children, and businesses all across the state. But doing the opposite has tremendous harm on people who are too easily kept out of sight and out of mind. We cannot be ignored. (Seneca Lake Guardian, Taylor)

Comment 27. Summary: SWMP26 should define clear steps for reducing the number of transfer stations in environmental justice communities.

Response 27. In 2018, the City enacted Local Law 152 (LL152) to address the issue that most of the city's private waste transfer stations and permitted capacity were located in four community districts: Brooklyn Community District 1, Queens Community District 12, and Bronx Community Districts 1 and 2. These districts were disproportionately impacted by this infrastructure. Pursuant to LL152, permitted capacity at putrescible and non-putrescible solid waste transfer stations was reduced by 50% in Brooklyn Community District 1 and by 33% in Queens Community District 12 and Bronx Community Districts 1 and 2. Your suggestions will be taken into consideration for future plans to more equitably distribute waste facilities.

Detailed Comments

I would like to focus on prioritizing environmental justice (EJ) by reducing the presence of Waste Transfer Stations in EJ neighborhoods (South Bronx, SE Queens, and N Brooklyn). Finally, the SWMP mentions "Environmental Justice" 58 times, but does not reduce the presence of Waste Transfer Stations and truck traffic in environmental justice neighborhoods. The SWMP needs to delineate clear steps for decreasing the hazards of Waste Transfer Stations and truck traffic to vulnerable populations. Plans for smaller and more distributed Waste Transfer Stations throughout the city should be put into place. (Pace University)

In New York City, over 14 million tons of garbage are produced daily, generating massive transportation and pollution impacts from privately owned and operated waste transfer stations. While the total amount of waste handled at private transfer stations has decreased approximately 17% since [Local Law] 152, the current solid waste system is still an ongoing environmental injustice in which five community districts handle nearly 24 waste facilities while 45 community districts have no waste facilities at all. Despite laws intended to change this, these communities of

color continue to deal with far more than their fair share of heavy truck traffic, safety hazards, pollution, noise, and odor that other neighborhoods are spared. (NYC EJA)

Comment 28. We cannot continue to rely on the same historic DSNY practices of collecting and then trucking or shipping our waste to waterways, landfills, or incineration facilities. We have polluted numerous waterways, local land in Staten Island, Newark NJ, and further upstate in Peekskill NY, and down South in VA and others. These environmental justice communities have been polluted. As a nurse, I want to emphasize that the people who live there are suffering from chronic medical conditions like asthma, heart disease, and cancer at higher rates than average due to their exposure to our toxic waste ... I want to point to the environmental justice communities, where we have a great deal of scientific evidence that pollutants from plastics, PFAS, and other toxins are affecting every bodily system. [Referenced] are 2 recently published news articles that explore the deleterious health effects of microplastics in humans and PFAS in a waterway at Camp Lejeune Marine Base outside Jacksonville, North Carolina¹⁶ ... (Herdan)

In New York City, over 14 million tons of garbage are produced daily, generating massive transportation and pollution impacts from privately owned and operated waste transfer stations. While the total amount of waste handled at private transfer stations has decreased approximately 17% since LL [Local Law] 152, the current solid waste system is still an ongoing environmental injustice in which five community districts handle nearly 24 waste facilities while 45 community districts have no waste facilities at all. Despite laws intended to change this, these communities of color continue to deal with far more than their fair share of heavy truck traffic, safety hazards, pollution, noise, and odor that other neighborhoods are spared. (NYC EJA)

DSNY needs to treat environmental justice as not just a buzz word, but as a true issue to address by reducing truck traffic in high pollution, low participating districts. It is unacceptable that waste is exported from Environmental Justice neighborhoods in Manhattan to Environmental Justice communities outside of the city like Newark, New Jersey and Chester, Pennsylvania. These host communities experience public health harms such as asthma and cancer rates that are substantially higher than our nation's average and our city's divertible waste is a contributing factor. The same Environmental Justice neighborhoods in Manhattan, like Harlem, Washington Heights and Lower East Side, have an organics capture rate under 4% due to lack of education on why and how to effectively separate their food scraps and in some areas, the accessible infrastructure to do so. (Dookie)

Response 28. *SWMP26* does not propose new solid waste transfer or combustion capacity, nor does it project increased reliance on landfilling or combustion as a strategy for managing waste. *SWMP26* discusses the environmental consequences of waste management and the prevalence of waste management infrastructure in environmental justice communities. *SWMP26* programs were developed to reduce and divert waste and recover resources, which will benefit the environment and environmental justice communities. *SWMP26* Education and Outreach Program includes **Strategy 114**, conduct door-to-door neighborhood canvassing for new initiatives or in areas with low compliance with waste management regulations. Together with other educational programming, this strategy will help to increase the organics capture rate in areas where it is currently low.

Comment 29. It's imperative that this upcoming SWMP considers GHG [greenhouse gases] and co-pollutant reductions in disadvantaged communities to be consistent with state and city law. New York's Climate Leadership and Community Protection Act (CLCPA) passed in 2019 obligating state agencies and entities, including the Department of Environmental Conservation (DEC), to ensure that all agency actions are consistent with a 40% reduction in statewide GHG emissions by 2030 and to prevent or mitigate disproportionate environmental burdens on Disadvantaged Communities (or DACs). (NYC EJA)

Response 29. New York City takes very seriously the impact of climate change and air pollution on disadvantaged communities. For more information on this topic, visit MOCEJ's page on the *Environmental Justice NYC Plan*: <https://www.nyc.gov/content/climate/pages/environmental-justice>. SWMP26 programs have benefits including the reduction of greenhouse gas and co-pollutant emissions. Your comment will help inform DSNY's continued participation in the development of the citywide *EJNYC Plan* and annual progress reporting (**Strategy 79**) and consideration of the distribution of environmental justice benefits in all SWMP26 programs (**Strategy 80**).

Comment 30. Summary: There are challenges with NYCHA waste management and recycling services, which is an equity and environmental justice concern. Commit more resources to NYCHA sanitation services, including workforce development, and to studying measures to address these challenges.

Response 30. DSNY agrees that NYCHA residents deserve safe, sanitary conditions with waste management services that allow for the disposal and recycling of materials equal to services provided for other residential buildings. NYCHA already receives the same "free" refuse collection as other residents and fees are for supplemental services which NYCHA would have to otherwise seek a private vendor to perform. For example, NYCHA residents receive additional sanitation services via property management caretakers who clean, collect, and store litter, bagged garbage, bulk waste, etc. DSNY will continue to partner with NYCHA to explore opportunities for increased diversion and is cognizant that NYCHA faces unique challenges with waste management and recycling related to building design, limited staff and storage space for solid waste management, and aging collection facilities. NYCHA's current sustainability agenda includes improvements to waste management, including centralized waste yards, pneumatic system collection, onsite composting, use of Smart Bins, and participation in DSNY's Citywide Residential Organics Program. DSNY will continue to work with NYCHA to improve waste management at NYCHA locations by implementing the following strategies included in SWMP26:

Strategy 27: NYCHA will increase organics recycling access for NYCHA residents, including through community-based solutions.

Strategy 47: NYCHA will increase the use of City-produced compost and mulch on NYCHA construction projects and at existing NYCHA development grounds.

Strategy 68: NYCHA will coordinate with DSNY to optimize the collection of all recyclable material streams citywide.

Concerns about waste management services, pest issues, and recycling access are addressed by NYCHA's compliance with Clean Curbs, investment in new waste yards, providing limited rear loader supplemental service, and having completed rollout of NYCHA's Recycle First Initiative.

Detailed Comments

End the Discrimination to NYCHA Residents in Waste-Handling Programs: About 1 out of every 16 New York City residents lives in NYCHA housing. Unfortunately, NYCHA properties have long suffered extensive challenges, largely as result of federal funding cutbacks decades ago. Among the problems faced by NYCHA residents are widespread shortcomings in basic sanitation services. These include lack of adequate refuse collection, vermin, and inconvenient or unavailable recycling and composting services. Making matters worse, NYCHA must pay the Department for basic sanitation services. The *Draft SWMP26* treats these and other sanitation problems in cursory fashion. (*Draft SWMP26* at [page] 148.) (NRDC)

Nearly forty years after New York City passed its recycling law in 1989, NYCHA residents are still excluded from equitable access to recycling services. This is not because residents don't care—but because of outdated infrastructure, poor bin placement, capacity challenges, and decades of underinvestment in sustainability solutions within public housing. NYCHA is home to nearly half a million residents, making it one of the most challenging environments in the city to implement effective recycling ... These communities experience some of the highest unemployment rates in New York City—56% of working-age residents report no income from employment, with an estimated 100,000 residents without jobs. Recycling, when done right, is not just a waste issue—it is a workforce and equity issue. (ICGT)

There is an apartheid system of residential waste management in NYC. There's NYCHA and then there's everyone else. (Lasky)

Add commitments to lead a one-year interagency study identifying broad-based measures needed to address long-running sanitation challenges at NYCHA properties, including identification of what can be done to eliminate rodent and vermin problems in NYCHA buildings and on NYCHA campuses. (NRDC)

Endorse legislation introduced by Councilmember Alexa Aviles that would prohibit the Sanitation Department from charging NYCHA for sanitation services, and provide NYCHA residents the same sanitation collection services offered to all other city households (NRDC)

Comment 31. DSNY must address the EJ implications of concentrating its organics processing through anaerobic co-digestion at the Newtown Creek Wastewater Recovery Facility in Brooklyn Community District 1 (CD1), which already has the highest permitted waste processing capacity of any community district citywide ... Analysis in our 2025 report *Expanding Composting in New York City: The Case for Passing and Implementing Intro-0696-2024* indicates that DSNY's plans to scale up co-digestion could add approximately 40 more trucks per day to the streets in CD1, undermining the goals of the Waste Equity law ... Local Law 85 of 2023 requires DSNY, as a part of the 2026 SWMP, to "include a plan to maximize the usable composting of organic waste collected." (Reynoso)

Response 31. Several initiatives and strategies under the Organics Diversion and Recovery Program are included to maximize the usable composting of organic waste and these strategies will be further developed as part of implementation. The primary function of the Newtown Creek facility is to treat wastewater. *SWMP26's* commitment to expand codigestion is not specific or limited to the Newtown Creek Wastewater Resource Recovery Facility (WRRF). The commitment is to utilize anaerobic digestion as one of many methods to process source-separated organics (SSO).

Comment 32. ... Give up making more methane from sewage, otherwise New York is hypocritically forcing upon others the plagues that New York is unwilling to burden on themselves. (Kronheim)

Should DSNY decide to move forward with co-location of new wastewater and/or organic waste management infrastructure at City-owned properties, we urge the Department to ensure these are not located within Disadvantaged Communities, who already face a disproportionate burden of the waste crisis. (EANY)

Response 32. Any facility representing new organic waste management infrastructure that is proposed as part of *SWMP26* implementation would undergo statutory Environmental Review and consideration of benefits and impacts on environmental justice communities.

Comment 33. Summary: The amount of New York City waste transported to Seneca Meadows and other landfills in disadvantaged communities should be reduced, not increased. The waste is contaminated and has significant impact on the health of residents and workers in the community.

Response 33. DSNY developed *SWMP26* strategies to meaningfully reduce the amount of New York City waste sent to landfills. DSNY acknowledges the concerns about the health and environmental effects of landfilling on nearby residents, including disadvantaged communities, which can be mitigated by the programs in *SWMP26*. In addition, DSNY notes that the Seneca Meadows Landfill does not receive a substantial amount of DSNY-collected residential waste; however, it does receive commercial waste generated in New York City. Through the Commercial Waste Zone Program, DSNY will obtain better data about the amounts of commercial waste collected in New York City and managed at landfills outside of the city. All disposal facilities are subject to applicable federal and state regulations.

Detailed Comments

As a community that's been designated by NYS as Disadvantaged—with cancer rates far above state and national averages—receiving even more waste is an existential threat. As a teacher, I see these harms every day. Kids ... who [have] grown up going to school within eyesight—and smelling distance—of the landfill come to mind. Their parents have to take them out of school on bad days to avoid asthma attacks, headaches, and nausea. We recently conducted a survey of more than 700 residents and the results were striking. Sixty percent have or had children at home near the landfill, and more than half have kids attending school nearby. Nearly one-in-four reported a household member diagnosed with cancer or heart disease since living near the landfill, and more than one-in-four reported asthma or respiratory illness. Forty-two reported miscarriages or stillbirths. And hundreds upon hundreds described chronic headaches, burning eyes and throats, fatigue, brain fog, and difficulty breathing. (Seneca Lake Guardian, Taylor)

We employ about 100 people from the [Northeastern U.S. and Canada] region ... every single day, they come to work expecting a safe, healthy environment. Too often, that expectation is not met—because of our proximity to the SMI Landfill. Because our concerns were repeatedly dismissed, our President Bill Lutz made the decision to invest in state-of-the-art Acrolug hydrogen sulfide air monitoring equipment at our headquarters in Seneca Falls ... [in] just 31 days—our instrumentation detected landfill-related hydrogen sulfide odors 52 separate times at or above the recognized odor detection threshold ... And this data aligns with what our people are experiencing. On multiple occasions, employees have become ill at work. They've gone home with headaches and nausea. They've expressed frustration, anxiety, and concern for their health ... We have filed complaints

with the town, the county, and the state. And despite those complaints, nothing has changed. New York City sends approximately 36% of its annual garbage to Seneca Falls ... Coincidentally SMI is seeking a 15-year expansion which would more than double their existing airspace. We are not anti-business. We are a business ... But we are firmly pro-health, pro-community, and pro-accountability. The Finger Lakes are not a dumping ground. Our workforce is not collateral damage. And our future should not be sacrificed for convenience. We are asking—clearly and respectfully—that decision-makers listen to the data, the science, and the lived experiences of the people who work and live here. And we are asking you to send a strong message to the DEC: The SMI Landfill's Valley Infill 15-year expansion application should be denied. It's time to stop trashing the Finger Lakes, start exploring real alternatives, and protect the communities that have already given enough. (Waterloo Container)

Communities are on the receiving end of this business. As one resident living near a landfill told CURES within the past two weeks, "The cars sometimes sit near homes for days before getting unloaded. There are rats and other rodents that get into the cars. Incinerator ash is released in the air as it's dumped out of railcars. Dust from industrial waste is everywhere. We are getting 9,500-12,000 tons a day dumped on our community and there's no way to inspect all of that. Our water source is way too close to these mountains of trash. People are being pushed out of their homes and forced to sell generational farms. It's so sad. Waste-by-rail is destroying every community it touches." Shipping C&D "away" from NYC has become a "cost-effective" method of waste management only because such health and environmental costs are not being counted. (CURES)

Problems for residents by landfills include that when construction debris is mixed with normal household trash and moisture it creates noxious gases like toxic hydrogen sulfide. (CURES)

Within New York State, communities like Seneca Falls and Niagara Falls located in Upstate New York cumulatively deal with over 40% of the trash exported by New York City, while a significant portion of their community are not white, and live within poverty. Reducing waste at its source is a crucial step in removing harm caused in these communities, and the SWMP must reflect this in its proposal. We are disappointed to see limited actions in the DSNY proposed SWMP to proactively protect DAC's and Environmental Justice Communities in New York and beyond from the burden caused by expanding overwhelmed landfills and the transportation of such waste to landfills ... (EANY)

Our community is home to Seneca Meadows, New York State's largest landfill and likely the single largest point source of methane in the state. Every single day, Seneca Meadows accepts up to 6,000 tons of garbage—nearly a third of it coming from New York City—and generates up to 200,000 gallons of toxic, PFAS-laden leachate which then gets trucked to sewage facilities that don't have the mechanism for removing these and other toxic contaminants before discharging them into our waterways and upstream from drinking water sources statewide—including the Mohawk and Hudson Rivers. We need New York City to recognize that its current solid waste management plan has dire consequences for our community unless it makes significant changes. And what NYC chooses to do could have a significant impact on whether or not this landfill closes when it's full or gets a permit to expand by another 47 acres and keep operating through 2040. (Seneca Lake Guardian, Taylor)

The SWMP should also plan to phase out the use of the problematic Seneca Meadows Landfill which was scheduled to close at the end of this year under the Town of Seneca Falls Local Law 3 of 2016. (TDT)

- Comment 34.** I am a concerned resident of the Jamaica, Queens community who lives near the Waste Transfer Stations in the Liberty Ave. area. The NYC regulations under (RCNY Title 16, Chapter 4-16 a) mandate an enclosed building requirement of all putrescible and non-putrescible waste at transfer facilities ... NYSDEC allows an exception for non-putrescible waste which may be stored in an outdoor area if it is stored in closed containers or covered trailers. Although NYSDEC offers this exception, in New York State, municipal laws on construction and demolition waste take precedence over less restrictive state regulations. At present in my community of Southeast Queens, the waste transfer stations on Liberty Ave. are not fully enclosed ... the area that houses the construction and demolition is open. With the more stringent NYC laws not enforced, it subjects the residents that live nearby those facilities to increased hazardous conditions and pollutants, resulting in adverse health conditions. (Scarborough)
- Response 34.** DSNY and the New York State Department of Environmental Conservation (DEC) both play a role in ensuring proper regulation of the permitted transfer stations in New York City. This includes an annual permit renewal process verifying compliance with applicable requirements. DSNY inspectors visit all facilities frequently and issue summonses when conditions that violate environmental health and safety rules are observed, and we encourage members of the public to report any concerns to 311. Certain New York City rules and regulations for transfer station sites and facilities may apply to any new facilities but do not apply retroactively to facilities in operation prior to the requirement. DSNY will continue to work with the State to ensure conditions do not present a health or safety risk and that waste is properly managed at waste transfer stations citywide, in accordance with applicable regulations.
- Comment 35.** I am a resident of Forest Hills, but I write with concern about DSNY truck parking in Richmond Hill, particularly on Atlantic Avenue, near the Van Wyck [Expressway]. Many garbage trucks from Richmond Hill District #9 Garage park on the street, near residences. Others are parked on the perimeter of Rizzuto Park. I attended a wonderful, well-attended event celebrating Diwali on Saturday, October 18th at Rizzuto Park, and I was distressed that DSNY trucks were parked around the park, and even right next to the staging area for the Diwali floats. This Indo-Caribbean community deserves a park free of garbage trucks. This is certainly an environmental injustice, as this working-class community of color is bearing the burden of the city's solid waste industry. (Bump Vena)
- Response 35.** DSNY continuously seeks alternatives to street parking for sanitation vehicles.
- Comment 36.** Work towards a system where DSNY and building staff do not have to lift bags, especially of trash. We should not be designing a system that requires substandard manual labor. As designed, the DSNY containerization rules for 1-30 unit buildings with two-wheeled bins is a compromised system which has smallish bins and slow lifts on trucks that leads to much manual lifting of bags and bins. An automated system that didn't require lifting would use larger bins and quicker double lifts on each truck for efficiency. (CZWD)

Response 36. The SWMP does not contemplate the mechanics of containerization; however, DSNY has noted this comment.

Public Review and Comments

Comment 37. My team has been following New York City's initiatives on food waste management over the past year, and we're glad there's an option for the public to comment on the newly proposed solid waste master plan. (Food Cycle Science)

Environmental Advocates NY intends to work with partners to provide technical insight and support New Yorkers in providing their own testimony. We appreciate DSNY's work to date and your continued engagement with environmental groups. We stand ready to collaborate on outreach and to help amplify participation during the extended period. (EANY)

I would like to thank the Manhattan & Brooklyn SWAB for arranging this opportunity to hear from the residents of NYC ... it is great that we are here today with what has been done so far, so thank you DSNY, and everyone for all your efforts. (The Brotherhood Sister Sol)

Response 37. DSNY appreciates the opportunity to review public comments provided by residents, community groups, and other stakeholders. DSNY also appreciates the efforts of the Solid Waste Advisory Boards in bringing together stakeholders and sharing public comments on *Draft SWMP26*.

Comment 38. Does the Department plan to present the major elements of the *Solid Waste Management Plan* in a format that is accessible to readers without specialized technical knowledge? While the public meeting presentation delivered on October 27, 2025, and the accompanying recording, were informative with respect to the Department's programs to increase diversion, they did not provide a similarly high-level overview of the scope and scale of the Department's infrastructure and system-wide operations. Many of my constituents would welcome a clearer, more accessible summary of these activities, but may find it challenging to engage with a document exceeding 200 pages or to navigate its more technical sections. (Gallagher)

Response 38. DSNY presented major elements of *Draft SWMP26* to the public on October 27, 2025, subsequently uploading the presentation and recording to the DSNY website. The focus of the presentation was on proposed programming for the 2026–2036 planning period. Within the *Draft SWMP26*, DSNY included an executive summary, which provides an overview of waste management current conditions in addition to proposed programs. Additional outreach on waste management current conditions is not planned at this time.

Comment 39. Summary: The 45-day comment period is insufficient for New York City residents and other stakeholders to carefully read, evaluate, and comment on the *Draft SWMP26* and should be extended.

Response 39. The initial public comment period was 45 days, ending in November 2025, to facilitate submittal of the *Draft SWMP* to DEC in January 2026. The public comment period was extended to January 16, 2026, to allow for additional engagement, while still allowing DSNY to submit the SWMP to DEC in time to obtain DEC approval by October 2026. DSNY encourages ongoing public participation

throughout the SWMP's 10-year implementation period as well as engagement on other solid waste management initiatives.

Detailed Comments

The tight deadline limited my ability to comment on everything, so my comments are mostly focused on the organics portion of the SWMP ... (Allen-1) The SWMP is a very long document and the average person won't be able to read the entire plan and the majority are probably not even aware of this plan and how it impacts daily life in NYC. With more time, more feedback could be provided, but the question remains, if DSNY will take heed of any recommendations made or if a larger authority, such as the Mayor or City Council's direction alone will dictate. (Allen)

We would like to see an extension of six months of the timeline for the SWMP to ensure all comments are fully incorporated and the new administration can weigh in. (CZWD)

We would like confirmation that the comment period for the *Draft 2026 New York City Solid Waste Management Plan* is extended to April 2026. Alternatively, we would like to request an extension for the comment period. We have begun a review of *Draft SWMP26* and have found the 45-day comment period to be insufficient. Notably, the New York City Council's hearing on this matter was deferred to December 9, 2025, which is after the deadline of November 17, 2025 that is currently posted on DSNY's website. We look forward to submitting our comments following the amended deadline. (Just Zero)

While the current 45-day public comment period meets the minimum legal requirement, it does not do this thoughtful and thorough plan justice. The plan is highly technical in nature and will directly impact New Yorkers' day-to-day lives, requiring active engagement to solicit meaningful public input—precisely the role the Solid Waste Advisory Boards (SWABs) were created to play. Established under Local Law 19 of 1989, as landfills were closing and environmental justice movements grew, the SWABs were designed to ensure public accountability and give residents a voice in shaping more equitable and sustainable waste policies. The current timeframe does not provide adequate opportunity for SWABs to analyze the plan, engage communities, and develop constructive feedback that could materially strengthen it. (Lander and elected officials)

Under 6 CRR-NY § 366-4.1(f), DSNY must submit its draft SWMP to New York State Department of Environmental Conservation (DEC) by April 29, 2026—180 days before the current SWMP expires on October 26, 2026 and the Council must authorize that submission before that date. Accordingly, the October–December 2025 Council review and vote window that DSNY published on its website does not permit the meaningful public engagement and feedback that a decade-long plan requires. We appreciate the importance of adopting a new plan swiftly, but we respectfully ask that DSNY extend the public comment period—in coordination with the SWABs—to allow sufficient time for thoughtful review, analysis, and community engagement, particularly given that the Council does not intend to advance authorizing legislation or hold a vote on such legislation before the end of the calendar year. (Lander and elected officials)

While this *Draft SWMP26* represents a historic update to New York City's waste and sustainability framework, the short turnaround for public comment drastically limits the ability of residents, community organizations, and stakeholders to meaningfully engage with its many complex and consequential proposals. Given the plan's scope and its long-term implications for equity, climate, and public health, the City should extend its current public comment period to allow for broader

outreach, accessible briefings in all boroughs, and sufficient time for communities most affected by waste infrastructure to provide informed, constructive feedback. (NYFWAN)

Recommended strategy: Future SWMPs will ensure a minimum of 120 days of public comment submission from the release by DSNY of its Draft Solid Waste Management Plan for the City Council and public review. (NYFWAN) (EANY)

After a preliminary review of the plan, we respectfully request an extension of the public comment period for *SWMP26*. Given the importance and length of the *SWMP26*, the current forty-five-day window is not sufficient for detailed technical review and intentional engagement with community members who wish to engage in the public comment process. Many other stakeholders, including community organizations, facility operators, advocates, and local governments both inside and outside New York City, also require adequate time to analyze the plan's proposals and potential impacts. Given New York City's scale, the decisions embedded in *SWMP26* will affect 8.3 million residents and numerous host communities across New York State and the Eastern United States for generations to come, highlighting the importance of an adequate public comment period. Accordingly, we ask DSNY to extend the public comment period by an additional sixty days, to ensure broad participation and thoughtful, well-supported submissions. If an extension is granted, we would be grateful for prompt notice of the new deadline and any updated schedule of DSNY briefings so that we may plan accordingly. (EANY)

Comment 40. Suggested Strategy: DSNY will host at least one meeting in each borough to engage with local communities on their draft plan and provide more opportunities for the public to review and comment on this important document before it's submitted to the State for final evaluation ... 45 days of public comments does not effectively engage community members, or ensure their voices are heard as intended by the New York Codes, Rules and Regulations (366-3.1)¹⁷ ... Ensuring thoughtful engagement from those on the front-line of the waste crisis must be at the forefront of DSNY's SWMP. (EANY)

Where is the community engagement? If I ever need to get something done, my first, second, and third choice for help is New Yorkers. (FABSCRAP)

DSNY's lack of outreach and engagement for this plan's creation was unacceptable. DSNY leadership testified at the City Council that there was no dedicated funding for outreach on this draft, and so the agency held only one virtual info session. (Reynoso)

Response 40. In addition to the public meeting held on October 27th, DSNY conducted extensive outreach, holding 33 meetings with city agencies, councilmembers, and key stakeholder groups to receive feedback on the *Draft SWMP26*. DSNY approaches this planning exercise as an ongoing part of our work. We used feedback received from various sources, from 311 reports to hearings on other DSNY programs, to inform this planning effort. Additionally, comments submitted on the *Draft SWMP26* were compiled by topic and the *SWMP26* was updated based on feedback received.

DSNY appreciates the outreach performed by the SWABs and sees the *Draft SWMP26* as the beginning of the public engagement process for programming during the 2026–2036 planning period. Additional opportunities for engagement with specific programs, initiatives and strategies proposed in *SWMP26* will be available over the next ten years. DSNY looks forward to engaging with the public as part of *SWMP26* implementation.

Comment 41. Summary: DSNY should collaborate with SWABs in the planning and implementation of the *SWMP26* programs as per Local Law 19 of 1989 and the Citywide Recycling Advisory Board (CRAB) should be reinstated.

Response 41. DSNY appreciates the public engagement organized by SWABs to review and comment on the *Draft SWMP26* and acknowledges the value SWABs provide supporting resource management and diversion in the City. DSNY does not object to the CRAB being reinstated. The CRAB board members are appointed by the New York City Council and the Mayor.

Detailed Comments

We on the SWABs have been legally tasked by [Local Law 19 of 1989] with assisting the Sanitation Department to maximize public participation in its recycling and related collection and processing programs. In the early years prior to the citywide rollout of the recycling program in 1993, the Sanitation Department sought and got our input on educational materials and outreach approaches, which we gladly gave, and we would again if asked ... Since Local Law 19 of 1989 stipulates that the SWABs advise the Department of Sanitation on ways to increase participation, the Department invited the SWABs in 1990 to participate in biweekly meetings with them and their consultants to help them narrow planning scenarios in preparation of the 1992 SWMP. The SWAB had hoped that DSNY would invite the SWABs to participate in planning of the current SWMP. We ask that, going forward, DSNY reach out to us on an ongoing basis to have input into planning, design, and execution of activities to optimize public participation in reuse, recycling, and organics collection programs, as Local Law 19 requires. (Clarke)

Restore (and update) the Citywide Recycling Advisory Board, as required by Local Law 19 (of 1989), and embrace it for support to advance various initiatives outlined in *SWMP26*, e.g., recycling right, organics, etc.—especially those centered on effective stakeholder engagement. As the draft *SWMP26* clearly shows, planning for waste management and materials recovery is not a static one-and-done effort—it requires continuous attention as materials change, infrastructure and systems evolve, laws and regulations are adopted, and public understanding and support is essential for progress in achieving zero waste goals. As intended by its original design, the Board should be broadly inclusive of stakeholders, including the industry's service providers. (GS)

The SWMP and the hearings, feedback, and public comments made to date are critical tests of public voice in the policies that impact us ... Unfortunately, public knowledge and opportunities to participate in policy is limited ... We are incredibly privileged to have multiple formal modes of public feedback, including the Solid Waste Advisory Boards ... The fact that the SWABs are holding open hearings today are evidence of the importance of these citizen-led efforts ... However, public participation is still limited and prior research shows that NYC public engagement outcomes are inequitable. New York City continues to be systemically inequitable. Resources for education and participation in waste policy are inequitably distributed. This means that an opportunity to shape the plan in ways that incorporate the interests of broader and especially environmental justice communities can be missed without deeper concerted efforts by the City. Especially when paired with education and inclusion investments, direct public inputs in policy lead to higher levels of public support, trust, and compliance ... The SWMP can be an opportunity to push our city towards deeper democracy ... by building participation objectives into the SWMP for next 10 years of implementation, and funding compensated and equity-centered participation such

as citizen's assemblies and new supports for the critical work already undertaken by community-led venues like the Solid Waste Advisor Boards. (Jenkins)

Thankfully, the city's Solid Waste Advisory Boards (SWABs), advocates, and the City Council have stepped up where DSNY has failed to ensure that New Yorkers knew about this plan and had the opportunity to share their ideas. (Reynoso)

We ask that, going forward, DSNY reach out to us on an ongoing basis to have input into planning, design, and execution of activities to optimize public participation in reuse, recycling, and organics collection programs, as Local Law 19 requires ... Involve the borough Solid Waste Advisory Boards and other stakeholders throughout plan development and implementation. (MSWAB)

Waste Prevention and Reuse Program

Increasing Diversion

Comment 42. Summary: SWMP26 must do more to increase diversion rates.

Response 42. DSNY appreciates the enthusiasm and engagement in identifying and creating a path to increase diversion and reduce waste disposal and export from New York City. EPR for packaging is the highest impact policy that can support these goals. As part of **Strategy 62**, DSNY will monitor progress on EPR policy for packaging in other jurisdictions and advocate for and advance EPR policy in accordance with PlaNYC and state legislative efforts. The primary goal of SWMP26 is to reduce waste generation and increase diversion to reduce the impact that solid waste management has on the city, the environment, and the communities outside of the city that host infrastructure used by the city. Waste export and disposal is the least preferred method of waste management according to the EPA Waste Management Hierarchy. Accordingly, DSNY looks forward to finalizing and implementing a local solid waste management plan that prioritizes waste reduction, reuse, and recycling over end-of-life material management practices.

To this end, SWMP26 includes the following material specific initiatives:

Initiative 1.1: Advance textile reuse programs and reduce textile waste.

Initiative 1.3: Reduce packaging and single-use items and encourage reuse.

Initiative 2.1: Increase the quality and quantity of organics diverted citywide.

Initiative 2.2: Increase the recovery rate of DSNY-managed organics.

Initiative 2.3: Increase composting and wood reuse.

Initiative 2.4: Expand codigestion and beneficial use of biosolids and biogas.

Initiative 2.5: Promote food donation and rescue.

Initiative 2.6: Increase in-city use of organic-derived products.

Initiative 3.2: Improve the recovery of collected metals, glass, plastics (MGP), and paper.

Initiative 3.3: Expand residential drop-off and recycling programs.

Initiative 5.2: Expand organics rules.

Initiative 5.3: Increase diversion of recyclables and organics.

Initiative 6.1: Implement Clean Construction Executive Order (EO23).

Initiative 6.2: Expand NYC DOT recycling in asphalt.

Initiative 7.1: Advance special waste recovery and EPR policies.

Initiative 7.2: Expand community events and centers.

Waste diversion stagnated during the previous solid waste management plan period due to multiple factors, including, but not limited to, changes in waste generation and policies as well as the global COVID-19 pandemic. With the implementation of *SWMP26*, DSNY anticipates diverting over 30% of DSNY-managed waste. This does not include the reduced quantity of waste anticipated to be reduced over the next decade.

Detailed Comments

“While planning to transition to a circular economy, DSNY must also plan to manage what is not recovered.” What is DSNY’s plan for this transition and what new programs does DSNY expect are needed to prioritize this and make this happen? Some efforts are indicated on page 169 but certainly not enough to drive NYC closer to zero waste. (Allen)

Reduction of all waste streams are important to address in parallel, but we could reduce exported waste by 50% if we optimize diversion of just 2 categories of our exported waste—organics and textiles. This would result in 50% fewer black plastic garbage bags that the city is racing to containerize when the priority should first be to reduce the number of garbage bags going into empire bins in the first place. Infrastructure for collecting food scraps and textiles already exists but requires scale which should be expedited. (Allen)

Waste Prevention and Reuse Programs are essential to building a sustainable, regenerative waste system for our city. Yet within DSNY, they are consistently overshadowed and under-resourced. Waste prevention and reuse do not feel central to DSNY’s mission, which has traditionally focused on collection and disposal of waste, snow removal, and street cleaning. As a result, these programs are often left to a small number of staff who simply do not have the financial resources, staffing, or agency required to make the changes we need. Additionally, because these programs are embedded within DSNY yet not core to its operations, they remain particularly vulnerable to budget cuts and agency reorganization. The Bureau of Recycling and Sustainability was dismantled under Commissioner Tisch and community composting funding was cut. (Sacks)

[To be successful (reaching zero waste goals in 10 years), a detailed, long-range plan must have]: A municipal reuse system akin to the recycling system. Conduct reuse characterization studies, design, size, and site the gentle collection of durable items/PERF (product evaluation and repair facility)/thrift and donation facilities. (MSWAB)

I concur with prior speakers who have noted that the plan doesn’t address the challenge of having less trash in the first place. We know that diversion rates are low and materials that could be recycled or composted are not. In order to address this huge challenge, I urge that we step back and consider, is this a people problem (i.e., people are not separating their trash correctly) or a structural problem? I contend that unless government drafts policy that can be implemented and

that physical solutions are in place, people, even those dedicated to this issue, cannot solve this problem. (Feibusch)

Diverting waste from landfills and incinerators is an environmental justice issue since many are sited in low-income or marginalized neighborhoods. (Leonard)

A myriad of solutions come with the diversion of waste. NYC can not only improve its waste diversion programs to ensure accurate allocation of recycling and composting but also develop a larger strategy to phase out the use of landfills and incinerators in New York City. (Taufer)

It is imperative we stop flatlining and instead plan, fund and execute a roadmap to wean us off export and disposal of our organics, recyclables and repairable items and move every year closer to full recycling, composting and reusing more and more of our resources. (MSWAB)

As Sanitation Chair, I worked closely with DSNY to support the de Blasio administration's stated goal of sending zero waste to landfills by 2030. However, the city's diversion rate continues to hover at 18.5% as of the most recent Mayor's Management Report, only slightly up from the previous five years and well under DSNY's stated goal of 23% and the long-term goal of keeping 100% of recyclable waste out of landfills. (Reynoso)

Waste management in 2026 can no longer be about pushing waste around from one area to another (at significant cost both financially but also to planetary and human health). Today, it must be managed holistically from waste generation to final disposal, and REDUCTION is our best tool in the toolbox. (Shah)

Comment 43. Establish public-private partnerships to manage ideas for circularity, using expert organizations such as Goodwill, Salvation Army, Housing Works, and Big Reuse, the SWABs, FabScrap and many other organizations already thinking about these things. (E. Cooper)

Response 43. DSNY's donateNYC partnership consists of 70 nonprofit organizations that fund their missions through the reuse of materials. In addition, DSNY will convene New York City's circular economy stakeholders (**Initiative 1.7**) by implementing **Strategy 19** (convene a network of organizations across sectors in the circular economy); **Strategy 20** (develop a virtual hub to increase coordination, compile research, collect data and share best practices), **Strategy 21** (support market development, research economic models, and develop contractual provisions to facilitate material reuse and material with recycled content, including reclaimed soil) and **Strategy 22** (partner with local organization to promote commercial C&D material reuse).

Comment 44. Revert the name of the Trash Academy back to the Zero Waste Academy, as it was originally conceived. Ensure the program reinstates zero waste content. (CZWD)

Response 44. The Trash Academy is designed to give New Yorkers a broad understanding of the New York City waste ecosystem. The curriculum centers waste reduction and diversion, with modules on the circular economy, organics recycling, electronic waste, and textiles recycling. Since its inception, the program has also offered context on the larger social, economic, and environmental factors that shape our city's waste footprint. These additional modules cover the history of waste in New York City, DSNY operations, current waste management strategies and priorities, waste and water, and waste and environmental justice. The current program name addresses the full scope of this content and invites more New Yorkers to discover and enroll in the course.

- Comment 45.** Develop zero waste consultant requirements, like in San Francisco, to work with underperforming buildings. (CZWD)
- Response 45.** DSNY will review San Francisco's program and its effects and consider implementation in New York City.
- Comment 46.** Avoid or reform "put-or-pay" disposal contracts that penalize redirection of waste from export to zero waste solutions. Require enough flexibility in all export contracts to allow maximum material recovery and meeting legislative goals ... (MSWAB)
- Response 46.** DSNY's sole contractual tonnage commitments are for organics processing.
- Comment 47.** [DSNY] can work with the Parks Department to phase out single-use plastics through requirements in contracts with their vendors. This is a win-win for both the [Department of Sanitation] and Parks by reducing solid waste being sent to incinerators and landfills- while simultaneously improving the cleanliness of our parks. Great models for waste reduction in parks are New York State Parks, which are currently in the midst of a three-year phase out of all single-waste plastics for all the vendors, and Hudson River Park—which has a Parks Over Plastics program. (350BK)
- City agencies have enormous purchasing power, and every purchasing decision can have a positive or negative impact on waste reduction/diversion goals. Education and training for city agencies purchasing agents should prioritize waste reduction and facilitate the sharing of excess resources with to the city's environmental footprint and increase agency and community collaboration. (Coyne)
- Response 47.** DSNY acknowledges the value of shifting City purchasing towards circular economy options. Local Law 112 of 2021 requires data collection and reporting on textile goods purchased by City agencies. As part of *SWMP26*, DSNY, in coordination with DCAS, will provide guidance on textiles used by agencies for evaluating material choices, offering end-of-life options, and including opportunities to reduce overall consumption (**Strategy 5**). In addition, Local Law 36 of 2010 requires City agencies to submit plans to DSNY to increase waste reduction and recycling. DSNY will work with City agencies to improve and implement these plans, as well as to offer education for agency-designated lead recycling or sustainability coordinators through courses hosted by DCAS. With improvements to the plans and better training, DSNY aims to increase diversion from City agency operations, as well as to set an example and showcase best practices for residents, institutions, businesses, and industry. DSNY made revisions to the *Draft SWMP26* to note this.
- Comment 48.** Under the IPP vision, you are shooting for 30% diversion by 2036. There was a section where the plan talks about the increase in various things like conducting events and trainings ... but it was a very small increase indicated. Seemingly far less than what will be required to reach the diverse population of this city and move the needle on capture rates significantly. (Allen)
- Response 48.** In developing the implementation of proposed program projections, DSNY calculated waste reduction and waste diversion. In the DEC Population and Municipal Solid Waste Composition Calculator, the default waste reduction factor is a conservative 0.5% per year. This waste reduction factor accounts for programming, such as education and outreach that encourages individuals to generate and dispose of less waste. Waste diversion was calculated separately based on

SWMP26 programming. Inclusion of projections in local SWMPs is a DEC requirement, and the projections are intended to be realistic and achievable. Projections should not be misunderstood as goals. DSNY shares the commenter's vision of greater diversion.

Comment 49. Summary: Assess and expand the donateNYC portal.

Response 49. DSNY will evaluate the donateNYC platform and identify opportunities for improvement in the next iteration of this resource. DSNY has made regular updates to the donateNYC platform since it originally launched to streamline the website and increase accessibility for users.

Detailed Comments

DonateNYC portal must also become a more comprehensive resource. At any given time, I see only a very few items even listed. What are the goals for this resource which has such great potential? (Allen)

We recommend a robust assessment to see how well donateNYC is working and whether it should be improved/expanded, or whether it is better to disband and instead lend support to platforms hosted by nonprofits or the private sector. (As context, during the DSNY/MOFP Maximizing Food workshop in Fall 2025 there was a technology breakout group with Foodstream, Rescuing Leftover Cuisine, Sharing Excess, donateNYC and others. There was consensus in the group that Foodstream's platform worked better than donateNYC because of the restrictions and resource constraints in the latter.) (CZWD)

We don't believe that donateNYC as it stands now is the right platform for the C&D sector. (CZWD)

Ideally DSNY should open up the donateNYC Portal to residents and not just businesses and nonprofits. (Allen)

Comment 50. Update DSNY's waste management plan requirements and review process for new residential buildings over 150 units: Update the excel spreadsheet so that it uses DSNY WCS [Waste Characterization Study] data of 2.1 lb/capita (not the current 3.5 lb/capita) and includes organic waste separation; do not suggest roll-off containers are used below ~1,000 units (currently suggests for 75 units); work with DOB and HPD to evaluate current code requirements, such as the required trash chute, compaction requirements and storage requirements, and align; include requirements for location of organics bins in new buildings—we suggest that they must be co-located with trash and recycling; require that collection of e-waste and textile waste is required for new buildings over a certain number of units; ensure that WMP approval is a "required item" prior to receiving a DOB construction permit. (CZWD)

Response 50. Strategy 64 is to update the residential Waste Management Plan approval process for multiple-dwelling buildings to ensure all recycling streams are included. DSNY will consider your specific suggestions as part of that process.

Comment 51. Summary: Community organizations play a role in equitable waste management programs, particularly NYCHA recycling, and funding should be allocated for community-based solutions.

Response 51. DSNY will consider suggestions provided by commenters as part of *SWMP26* implementation. The plan includes the following strategies related to recycling and organics management at NYCHA, partnerships with community organizations, and diversifying material reuse and recovery:

Strategy 7: Support agencies, residents, nonprofits, and community organizations to engage in reuse and repair by offering technical assistance, strategic relationship development, and access to funding and donation opportunities.

Strategy 13: Expand access to community-based reuse centers in each borough and encourage lending libraries and sharing networks.

Strategy 14: Integrate repair into community reuse and recycling events.

Strategy 19: Convene a network of organizations across sectors in the circular economy.

Strategy 20: Develop a virtual hub to increase coordination, compile research, collect data and share best practices.

Strategy 21: Support market development, research economic models, and develop contractual provisions to facilitate material reuse and material with recycled content, including reclaimed soil.

Strategy 22: Partner with local organizations to promote commercial C&D material reuse.

Strategy 27: Increase organics recycling access for New York City Housing Authority (NYCHA) residents, including through community-based solutions.

Strategy 47: Increase the use of City-produced compost and mulch on NYCHA construction projects and at existing NYCHA development grounds.

Strategy 51: Manage available funding for community composting groups and botanical gardens in the city and collaborate on outreach and education.

Strategy 52: Work with community composters to operate a composting facility on DSNY property in Gowanus, Brooklyn.

Strategy 53: Collect and compile data from community-scale composters in the city to quantify the amount of material composted.

Strategy 112: Continue to attend a variety of community events and activities citywide and offer in-person event requests on the DSNY website.

Strategy 113: Identify outreach opportunities with local elected officials and community-based organizations.

Strategy 114: Conduct door-to-door neighborhood canvassing for new initiatives or in areas with low compliance with waste management regulations.

Strategy 117: Craft digital tool kits to provide downloadable content to be used by community groups to further outreach and education.

Strategy 119: Conduct outreach activities in partnership with community groups, focused on providing bags of compost, kitchen containers, and paper bags for leaf and yard waste to the public.

Strategy 120: Train community groups on DSNY services and talking points to help them be well informed “ambassadors” of DSNY programs.

Strategy 121: Encourage community groups to use culturally relevant engagement strategies to tailor their message and event formats to diverse communities.

Strategy 122: Conduct neighborhood walkthroughs with community partners and elected officials to observe area conditions and apply targeted outreach.

NYCHA completed the rollout of the Recycle First Initiative, increasing recycling awareness and educating staff regarding the proper and strategic daily operational handling of both waste and recyclables. Resident education will continue through basic but impactful sending of monthly reminders to resident service coordinators and coordination with NYCHA sustainability staff and their outside partners.

Detailed Comments

Our work has helped inform Local Law 49 of 2017 and the Climate Leadership and Community Protection Act. Yet despite contributing to environmental justice policy and demonstrating measurable results, frontline organizations like ICGT remain largely excluded from implementation, funding, and formal partnerships. This directly contradicts the intent of these laws, which call for prioritizing disadvantaged communities and resident-led solutions ... We respectfully urge DSNY to ... execute formal MOUs between DSNY, NYCHA, and community-based implementers ... Create a dedicated budget line to fund resident-led recycling models like ICGT ... New Yorkers are constantly asked to do their part, yet NYCHA residents are denied the tools to succeed ... Without intentional investment in community-based solutions, the City will continue to reinforce inequities instead of dismantling them. (ICGT)

I thought I was doing my civic duty by recycling in my development—only to witness those recyclables being thrown away with the trash. I later learned that recycling at NYCHA was essentially nonexistent and had been out of compliance with the city’s recycling law for decades. I began hauling my recyclables outside of NYCHA, but I quickly realized individual effort was not enough. The system itself was broken. I activated the Resident Green Committee at Mott Haven Houses, conducted door-to-door outreach, held community meetings, and partnered with local organizations to mobilize residents. Out of this work came the Right to Recycle Collection Initiative—a resident-led, door-to-door recycling model designed specifically for public housing. During a six-month pilot in Brownsville, Brooklyn, recycling rates increased from zero to eight percent in just four months, and more than 16 tons of recyclables were diverted. Despite this success, no sustained support followed. The program continued for another year only through crowdfunding—demonstrating both the model’s scalability and the city’s failure to invest in proven, community-based solutions ... We respectfully urge DSNY to ... Fully invest in programs that combine on-site education, meaningful resident engagement, and workforce pathways. (ICGT)

Comment 52. Summary: DSNY should prioritize working with NYCPS and city colleges to better manage waste, especially through the development and implementation of education and reuse programs.

Response 52. DSNY recognizes the opportunities to reduce waste and increase waste diversion at NYCPS and other educational institutions and appreciates the array of strategy recommendations suggested through public comments. In the preparation of the *Draft SWMP26*, DSNY collaborated with NYCPS to review existing programming and identify future programming. Accordingly, DSNY included the following strategies:

Strategy 12: NYCPS and DSNY will expand single-use plastic waste reduction and other waste reduction initiatives in schools and other educational institutions.

Strategy 28: NYCPS will ensure continuity in training and education to increase participation in the school curbside organics collection program.

Strategy 44: NYCPS will expand food rescue initiatives and improve data collection at New York City public schools, with DSNY support.

Strategy 48: DSNY will provide public schools and gardens with bags of compost for educational purposes.

Strategy 115: NYCPS will continue to provide waste sorting education and training to school students and their families.

Additionally, NYCPS is a stakeholder in several initiatives and will continue efforts to reduce waste and consider meal service options as feasible. DSNY will continue to work with NYCPS and other educational institutions and organizations to implement *SWMP26* and further consider the idea suggested. The DSNY team working with NYCPS sustainability leaders is active and integrated into the Bureau of Solid Waste Management.

Detailed Comments

School waste is a tremendous problem, especially at the end of the school year. Much more could be done if DSNY would partner with DOE [NYCPS] and schools. What can DSNY do to reduce the tremendous amount of waste at schools and educate young New Yorkers to reduce waste? I don't recall any mention in the SWMP of the DSNY team that works with schools. Does that team still exist? If so, what do they do that you can add to the plan to prioritize waste reduction in schools? (Allen)

Work with the many colleges in NYC to set up resale of usable items ... from dorms at end of each semester that currently and tragically go into dumpsters. (E. Cooper-4) Mandate and manage reduction of single-use items in schools, city buildings, stadiums, hospitals. (E. Cooper)

We recommend including a plan to work with DOE [NYCPS] to move to reusable trays in NYC schools. (CZWD)

As noted in the 2023 DSNY Waste Characterization Study, as much as 83 percent of school waste could be diverted—a figure that is higher than the citywide average. Currently, only an estimated 17 to 20 percent is diverted. Closing this gap must be a priority. The plan does not set a target for how much single-use plastic will be reduced or by when. For example, non-recyclable plastics ... make up 8 percent of waste in schools. Will DSNY work with NYC Public Schools to prioritize phasing out this type of waste? (Cocco-Klein)

Develop and implement a plan to switch NYC's 1,800 public schools (serving 900,000+ students) from single-use items to reusables—saving at least 3 million single-use items per school day (assuming each student uses a cup, fork, and plate). (Sacks)

Reduce [school] cafeteria waste by switching from individual milk cartons to bulk milk dispensers and establishing share tables. (Sacks)

Work collaboratively with schools (public and private, from nursery through college) at the end of each school year to create reuse systems for school supplies, books, furniture, and more. (Sacks)

Build Little Free Libraries at each school to conveniently recirculate books during library weeding. (Sacks)

Help donate or otherwise reuse unwanted school furniture. (Sacks)

Identify potential sources of government waste in advance (e.g., closing down shelters or dismantling dining sheds) and develop reuse plans beforehand. (Sacks)

Reuse

Comment 53. Summary: Increase the number and frequency of reuse and repair pathways throughout the city.

Response 53. DSNY looks forward to increasing community reuse opportunities through **Initiative 1.4** (increase access to reuse centers and support reuse and repair events), **Strategy 13** (expand access to community-based reuse centers in each borough), and **Strategy 14** (integrate repair into community reuse and recycling events). These strategies will increase accessibility to public reuse and repair opportunities and support community building.

Currently, DSNY is excited to continue expanding residential collections through **Initiative 1.1**, advance textile reuse programs and reduce textile waste, and **Initiative 2.1**, increase the quality and quantity of organics diverted citywide. Although DSNY appreciates the interest in creating a curbside residential reuse program, at this time, it is not practical. The suggestion of a curb-to-market or curbside collection for reusable durable goods will be considered as an alternative in future planning periods.

DSNY notes that currently curbside redistribution, often referred to as “stooping” of durable goods, including furniture, occurs through informal pathways, such as social media platforms. To learn more about this informal curbside exchange of goods, DSNY refers readers to **Attachment B: Waste Reduction, Reuse, and Recycling**.

DSNY recognizes the challenges associated with reuse, including disposing of useful items and accepting used items. DSNY appreciates the ongoing efforts of New York City residents to support reuse through thrifting, durable goods swaps, community gifting, and other pathways.

Detailed Comments

It is regrettable that no money is spent for curbside collection of durable products discarded for reuse and repair and there are no municipal collections at curbside and centralized repair despite the far greater value per ton of repaired goods compared with recycled commodities and organics. (Clarke)

[Create] sales warehouses for secondhand and repaired items, with great prices. Potential to use empty retail spaces for “pop-up CitySales,” thus providing income for building owners ... (E. Cooper)

I am interested in whether the City has considered a pathway to elevate reuse into a municipal, citywide curb-to-market system—similar to how recycling and organics collection are currently treated—so that all New Yorkers have a convenient opportunity to participate in reuse and avoid sending repairable or reusable items to landfills or incinerators. Such an approach could include gentle collection methods and centralized repair or refurbishment facilities. (Gallagher)

I appreciate the expanded number of reuse/repair events to one in each community district per year, but that is still too few. Community and volunteer repair activities are growing exponentially. Is there a way to provide city-owned space, insurance and small mini-grants for these efforts? (Lasky)

The early years of a [successful detailed] plan would involve studying how to maximize prevention, reuse, recycling and organics collections as well as phasing in infrastructure to collect, process, and sell reusable products and materials that are collected, sorted, repaired, and salvaged. Low hanging fruit in the first years, then harder items ... Measure reuse/repair potential at curbside. This type of study is needed to understand the quantity, type, condition for repair or salvage, and distribution of reusable consumer goods and with this information design routes to gently collect the goods, transfer to a Product Evaluation and Repair Facility and size and site such facilities. (MSWAB)

Reusable goods are difficult to get rid of. No one wants to throw out something useful and in good shape, but it is difficult to find people who need and want what someone wants to discard. Not everyone wants a stranger coming to their home to pick something up. (Ryan)

Create community reuse centers that host events around repair, dyeing (e.g., indigo workshops for stained clothing), upcycling, and swapping. These could double as supply centers for schools and nonprofits—similar to Materials for the Arts—ensuring at least one in each borough ... Host monthly community swaps in each district (e.g., in churches, on open streets, or at community centers) ... Increase lending libraries. (Sacks)

Comment 54. In light of our government's current focus on tariffs, reuse of materials can prove to be an economically viable alternative to disposal as less raw materials will be needed. (Leonard)

Response 54. DSNY appreciates the acknowledgement that reused materials and secondhand goods have monetary value and that reuse reduces the demand for raw materials.

Comment 55. Pilot a monthly furniture collection day when residents can set out unwanted furniture. Neighbors could walk around and take what they need, followed by nonprofit partners with trucks, and finally by DSNY for last-resort disposal. (Sacks)

[Create] a system for collecting bulk items such as usable or repairable furniture that currently is put out on curbs, much of which winds up in trash. Small truck pickup network ... (E. Cooper)

Response 55. Furniture donation and reuse opportunities are available through donateNYC. *SWMP26* also includes the following strategies and initiative to facilitate reuse, repair, and lending:

Strategy 7: Support agencies, residents, nonprofits, and community organizations to engage in reuse and repair by offering technical assistance, strategic relationship development, and access to funding and donation opportunities.

Strategy 13: Expand access to community-based reuse centers in each borough and encourage lending libraries and sharing networks.

Strategy 14: Integrate repair into community reuse and recycling events.

Initiative 1.7: Convene New York City's circular economy stakeholders.

Comment 56. Summary: Expand requirements and support for reuse and donations from stores, restaurants, venues, and corporations.

Response 56. DSNY appreciates the suggestions for waste reduction through donation and will consider them as part of the implementation of *SWMP26* under the Waste Prevention and Reuse Program.

Detailed Comments

DSNY should explore opportunities to partner with real estate developers who are converting commercial buildings to residential and discarding astounding volumes of reusable waste. DSNY should be monitoring and capturing waste data for these conversions. If not DSNY, perhaps DOB [New York City Department of Buildings] can help. (Allen)

Work with stores to sell out of date or single items at discounts through “CityStores.” (E. Cooper)

Require that corporations donate hygiene items (pads, tampons, toothpaste, soap, shampoo, etc.). (Sacks)

Support thrift stores in managing donation overflow—starting with waste audits to understand what’s being discarded, identifying end markets for those materials, and providing city-supported space for processing and selling excess donations. (Sacks)

Create a protocol for rehoming or otherwise properly disposing of belongings in elderly homes once a resident dies (e.g., prescription drugs safely disposed of, textiles in textile collection bin). (Sacks)

Require movie sets to rehome usable props, costumes, and set pieces. (Sacks)

[Provide] donation support for stores that are closing. (Sacks)

Require that restaurants with sit-down spaces and corporate cafeterias offer reusables. (Sacks)

Require that stadiums, theaters, and other large venues have a reusable cup option (potentially a deposit system). (Sacks)

Comment 57. What can be done during huge events like the marathon, parades, and New Years Eve which all generate an overwhelming volume of trash and overflowing litter baskets? (Allen)

Response 57. DSNY works very quickly to clean up after large events. One example of waste reduction at large events is that Road Runners partners with organizations to collect clothing at the start of the New York City Marathon. The Mayor’s Office also developed a sustainable event guide, “Good Clean Fun,” which provides guidance on proper waste management for event organizers.

Comment 58. Build out Sharing Network or Rentals of things like tools or cleaning, sports equipment and ... toys, games, school supplies ... (E. Cooper)

Consider working with NYC Libraries to support expansion of lending beyond books, for example tools, musical instruments etc. (CZWD)

Provide support for residents with unwanted items—whether they’re moving, emptying an apartment, or struggling with hoarding. (Sacks)

I am retired (and have more time) and dedicated to this. So, in addition to the regular recycling program, I try to sort and get my trash to the best place. My goal is that there be nothing in my

trash. Rarely able to meet this goal. Takes time and effort BUT what about people who don't have the interest and/or the time to do this? The city must create the structures to make it easy for residents to sort and dispose of things properly and conveniently. Once the physical structures are in place, a massive education campaign, combined with both incentives and enforcement, needs to be rolled out. Absent this, we continue to drown in our trash and people living and working in EJ places suffer the health consequences. Is our city, under a new, forward-thinking administration, ready to take on this challenge? (Feibusch)

Response 58. In addition to DSNY's existing donateNYC platform and "How to Get Rid of" search tool, *SWMP26* includes strategies to facilitate reuse, repair, and lending. See response to **Comment 55**.

Comment 59. We believe like DSNY that there is opportunity for [container reuse programs] in New York City. Whether as part of its food service districts—or large venues—we can now consider tested [reuse and sortation] models with financial, operational, and consumer-experience data. We encourage DSNY to further consider this proposal. (TOMRA)

Response 59. Thank you for introducing us to your company. All New York City government procurement must follow the City's Procurement Policy Board Rules. As a city agency, DSNY does not advocate for one company over another. For information on doing business with New York City agencies, please go to "Sell to NYC" at: <https://www1.nyc.gov/site/dcas/business/procurement-sell-to-nyc.page>.

Companies can also apply to become a listed vendor at the Mayor's Office of Contract Services: <https://www1.nyc.gov/site/mocs/legal-forms/payee-information-portal-pip.page>.

These sites provide vendors with the information necessary to work with the City, including information on enrolling as a new vendor, becoming certified as an M/WBE, nonprofit assistance, and current contracting opportunities.

Single-Use Plastics and Packaging

Comment 60. [Suggested] Strategy: DSNY and NYCPS will partner to advocate for funding to supply public schools with non-toxic, reusable dishware and utensils to mitigate the need for single-use plastics ... In line with this concept of reducing single use packaging and containers, we commend the steps New York City Public Schools (NYCPS) have taken to reduce single use plastic through their "plastic free lunch days"¹⁸ that occur in schools within kitchens once every three weeks. Whilst there is no specific data available on the cost of supplying all schools with reusable stainless steel/non-toxic cutlery and dishware, [research] suggests similar savings could be expected over numerous years, but upfront fiscal support is critical in implementing a successful program. These costs can be recouped through significantly reducing the need to supply single use cups, dishware, and utensils as well as a reduction in the collection, transportation and disposal of waste by DSNY. (EANY)

Response 60. *SWMP26 Strategy 12* focuses on reducing single-use plastic and other waste in schools. NYCPS agrees with the intention to reduce waste and will continue to prioritize opportunities to reduce

waste from packaging. DSNY appreciates the support for this effort and the information provided in the comment.

Comment 61. [Suggested] Strategy: DSNY will monitor and advocate for New York State legislation that establishes consumers' right to reduce single use packaging for food and beverages, in addition to state extended producer responsibility legislation that addresses key waste, health and environmental issues ... The NYC SWMP must enlist strategies that address this problem both holistically and incrementally. A key solution is providing support for the NYS legislation known as “Right to Refill”¹⁹ which would require food service establishments to permit the use of reusable beverage and food containers provided by customers that are of a safe and clean standard ... We urge DSNY to highlight in the 2026 SWMP more specific areas of EPR that would positively impact the NYS and NYC circular economy ... (EANY) (Scovell) (Bargholz)

Response 61. As part of **Initiative 1.3**, reduce packaging and single-use items and encourage reuse, DSNY may consider opportunities for reusable container refill programs in retail and food service.

Comment 62. Summary: *SWMP26* needs to do more to prioritize the reduction of plastic waste.

Response 62. *SWMP26* includes several strategies for reducing single-use plastics: monitor progress on EPR policy for packaging in other jurisdictions and advocate for and advance EPR policy in accordance with *PlaNYC* and state legislative efforts (**Strategy 62**); expand single-use plastic waste and other waste reduction initiatives in schools (**Strategy 12**); and **Initiative 1.3**, reduce packaging and single-use items and encourage reuse, through which DSNY may consider opportunities for reusable container refill programs in retail and food service. Your support for single-use plastic reduction is appreciated and will help inform the implementation of these strategies.

Detailed Comments

Plastic reduction needs to be a priority, especially regarding single-use plastics. For those of us who are dedicated in separating our organic waste and recyclables much of our waste is plastic packaging. (Queens Community Board 5)

The Draft Plan recognizes that “product packaging substantially contributes to the amount of waste generated in New York City and is a major source of waste from single-use materials,”²⁰ and it incorporates several programmatic strategies to reduce the volume of single-use packaging that enters the waste stream. Despite being widely unrecyclable, many companies choose to package their products in plastic. Approximately 40% of all plastic produced each year is used for packaging.²¹ Virtually none of this material is recycled. In 2021, only 5% of all plastic waste generated by U.S. households was recycled.²² This is unlikely to change, even with producer funded recycling systems, because most of this plastic isn’t technically or economically capable of being recycled. In fact, a recent report from Greenpeace which surveyed 370 material recovery facilities in the United States found that only PET #1 and HDPE #2 currently meet federal guidelines for recyclability.²² All other forms of plastic do not even meet our weak federal requirements for recyclability, which primarily just focus on access to services.²³ (Just Zero)

The plan should definitely go further in regulating single-use plastics. (Vezyroglou)

Plastic waste: straws, bottles and tops, cigarette butts, chewing gum, wipes, etc. ... Plastic is in it all, discarded in our waste, spilled into our streets, and even microplastics now found in our bodies

and bloodstreams. Plastic virtually never goes away/disintegrates. More legislation against single-use plastics should be enacted, and businesses urged to find alternatives. Big Plastics is a big business and so hard to fight. We've got to do more and better. (Gorman)

Comment 63. There should be laws/regs which prohibit stores from packaging produce—[commenter attached a photo]. It is anti-consumer and anti-environment. (Lasky)

Add commitments to advance proposals for city and state legislation to prohibit single-use plastic packaging in the sale of fresh, unprocessed fruits and vegetables, with limited exceptions where necessary to control for spoilage. (NRDC)

Response 63. *SWMP26* includes strategies for reducing single-use plastics: monitor progress on EPR policies for packaging in other jurisdictions and advocate for and advance EPR policy (**Strategy 62**) and reduce packaging and single-use items and encourage reuse (**Initiative 1.3**). Your suggestion to focus on produce packaging is noted and will help inform the implementation of these strategies.

Packaging and Plastic Waste Reduction

Comment 64. We support DSNY's goal of promoting packaging reuse and reducing the amount of packaging used and disposed of ... NYLCV supports DSNY's efforts to explore innovative pilot programs [including the following]: Container Reuse Pilot, bring-your-own container or exchange programs, and Large Venue Container Reuse Pilot. We hope DSNY will explore and implement new container reuse pilot programs under the next Mayoral Administration. (NYLCV)

Response 64. DSNY appreciates the support for *SWMP26* strategies promoting packaging reuse and reducing the amount of packaging used and disposed. During the planning period, DSNY looks forward to promoting a pilot of reusable packaging and container reuse programs (**Strategies 10 and 11**).

Comment 65. Plastic packaging makes up 40% of solid waste. Recently on December 12, 2025, I attended a drop-in visit to Assembly Speaker Carl Heastie's district office on E. Gun Hill Road. Arriving early, I decided to pick up some plastic trash from the sidewalk on my walk from the subway to his office. In two blocks, I collected two large shopping bags full of plastic trash from the sidewalk: single-use plastic bottles, plastic clam shells, plastic shrink wrap used to bundle shipments, Styrofoam take-out containers, plastic six-pack rings, plastic sachets from potato chips and other fast food. This is the plastic trash that DIDN'T make it into the trash bins. Imagine what did! ... Americans need to develop a "culture of care." In Europe, you don't see the kind of litter and debris all over the streets and sidewalks the way you do in the United States. We need to show our citizens our government and institutions care about the environment. (Beyond Plastics Queens)

Response 65. DSNY appreciates the efforts of residents to help keep our city clean and is proud of the work of the Sanitation Foundation in this regard. We agree that a "culture of care" can support all New Yorkers in working together for a cleaner city.

Comment 66. [In addition to the necessary State Legislation, the following New York City council bill needs passage] Int 0741-2024²⁴ ... A Local Law to amend the administrative code of the city of New York,

in relation to prohibiting city agencies from procuring single-use water containers ... [This bill] “leads by example,” eliminating plastic water bottles in our city agencies. (Beyond Plastics Queens)

City legislation needs to be passed that would cut down on solid waste. For example, Intro 741 prohibits city agencies from buying single-use water bottles ... (Leonard)

- Response 66.** DSNY appreciates the compilation of local law introductions and recommendations to reduce plastic packaging and single-use plastics in New York City’s waste stream. DSNY will continue to act in accordance with local laws and regulations to support plastic packaging and single-use plastic reduction. DSNY will provide technical expertise and support to City Council to ensure proposed bills are practicable.
- Comment 67.** Require reusable food serviceware at large food service establishments, such as through passage of Intro 1003-2023.²⁵ First the feasibility of the bill should be assessed—it may need to be phased in with stadiums and large food halls first, and to ensure that washing facilities are currently available. Stimulate expansion of industrial washing facilities in NYC. Partner with the hospitality industry to quickly and inexpensively raise the profile of this issue. (CZWD)
- It would be helpful to understand the City’s plans to reduce waste generation upstream through legislation and incentives, including measures such as restrictions on unrecyclable packaging and other waste prevention strategies (Gallagher)
- We urge DSNY to continue working with the Department of Consumer and Worker Protection (DCWP) to enforce Local Law 17 of 2023, which prohibits service establishments and food delivery platforms and couriers from providing utensils, extra containers, napkins, and condiment packets unless requested by customers. (NYLCV)
- Response 67.** DSNY agrees that waste reduction efforts and policies that require or support them are the most effective ways to reduce the impacts of solid waste management. DSNY encourages all residents, visitors, and organizations to consider reusables where practical. As part of **Strategy 10**, DSNY will promote at least one pilot of reusable packaging with a New York City partner. DSNY also participates in industry groups and associations leading this growing trend, bringing best practices back to New York City partners and programs. Information on local legislation in progress is available on the City Council’s website: <https://council.nyc.gov/>.
- Comment 68.** In addition to the necessary State Legislation, the following New York City council bill needs passage ... Int 0900-2024. A Local Law in relation to requiring the installation of outdoor drinking fountains in parks under the jurisdiction of the department of parks and recreation and in other public places ... [This bill] would encourage citizens to carry their own water bottles. (Beyond Plastics Queens)
- Intro 900 would establish water bottle refill stations in public spaces across the city. (Lenoard, 1/16/2026)
- Increase the number of water bottle fountains at stadiums, theaters, and museums. Expand public access to water fountains and bottle refill stations. (Sacks)
- Response 68.** DSNY and NYC Parks support additional water bottle refill stations to help reduce waste. NYC Parks maintains over 3,400 exterior drinking fountains throughout parks and playgrounds, making

Parks a major provider of clean drinking water for New Yorkers. NYC Parks is already working to comply with Local Law 93 of 2025, which requires the installation of drinking fountains within parks over the next 10 years.

Comment 69. Does “promote at least one pilot packaging reuse program” include financial support? We believe it should. (CZWD)

Response 69. DSNY will determine the financial structure of the pilot packaging reuse program as part of implementation.

Comment 70. Stimulate expansion of industrial washing facilities in NYC. Partner with the hospitality industry to quickly and inexpensively raise the profile of this issue. (CZWD)

Adopt Strategies that recognize the health and environmental dangers of petroleum-based plastics. The *Draft SWMP* acknowledges the problems of plastic waste. It notes, for example, that recycling and reuse of plastics is “more challenging” than recycling of metals, glass, paper, or cardboard. (*Draft SWMP* at [page] 150.) But it does not, in its current form, include strategies designed to secure the dramatic reductions in use of plastics, especially single-use plastics. (NRDC)

[Provide] support for bulk refill shops. (Sacks)

[Implement] waste management plans that reduce unnecessary packaging and single-use products. (Seneca Lake Guardian, Taylor)

We must embrace reuse systems to avoid ubiquitous single-use plastic usage. (Shah)

Response 70. DSNY appreciates the thoughtful strategy suggestions provided. It should be noted that the *SWMP26* Waste Prevention and Reuse Program includes multiple strategies for reducing petroleum-based plastics, including promoting at least one pilot of reusable packaging with a New York City partner (**Strategy 10**), promoting a container reuse program at a public venue (**Strategy 11**), expanding single-use plastic waste reduction and other waste reduction initiatives in schools and other educational institutions (**Strategy 12**), and monitoring progress on EPR policy for packaging in other jurisdictions and advocating for a New York State EPR for packaging policy (**Strategy 59**).

Comment 71. [DSNY] should work with DOE [NYCPS] and Parks to institute a phase-out of single-use plastics through their procurement departments and vendors. As Borough President Reynoso stated, the purchasing for cafeterias in our public schools is controlled by the City—we have the power to reduce packaging and plastics—we should use it! (350BK)

Response 71. DSNY will partner with New York City Public Schools to expand single-use plastic waste reduction and other waste reduction initiatives in schools and other educational institutions (**Strategy 12**). Through RFPs and license agreements, Parks strongly encourages sustainable practices and is working with vendors to phase out plastic usage and single-use items. Many snack bars use plastic utensil alternatives (bamboo, for example). Additionally, Parks has been aggressively phasing out single-use plastic bottles (21 ounces or less, as per Executive Order 54) since 2020.

Comment 72. Plastic packaging presents inherent risks to public health which cannot be addressed through recyclability. For instance, a recent study found that nearly 200 chemicals connected to breast cancer are found in food packaging and that these carcinogens can migrate into the human body.²⁶ Another study found that more than 3,000 chemicals used in food packaging commonly leach into food and enter the human body.²⁷ These chemicals include BPA, phthalates, and PFAS, which are linked to disruption of the endocrine system, tumor growth, abnormal reproductive function, neurological harm, immune issues, and other effects.²⁸ (Just Zero)

The innate risks and limitations of single-use packaging, especially plastic packaging, can only be addressed through measures that prioritize source reduction and limit the use of toxic chemicals in packaging. The Draft Plan's inclusion of reusable packaging pilot programs and single-use plastic reduction strategies are key steps on the path to source reduction. However, we urge DSNY to add to the Draft Plan strategies, including city ordinances, that restrict the sale and distribution of certain plastic packaging products and limit the use of toxic chemicals in packaging. (Just Zero)

Response 72. *SWMP26 Initiative 1.3*, reduce packaging and single-use items and encourage reuse, aims to reduce the use of single-use packaging and plastics used in New York City. DSNY will also monitor progress on EPR policies for packaging in other jurisdictions and advocate for and advance EPR policy in accordance with *PlaNYC* (the City's sustainability blueprint) and state legislative efforts (**Strategy 62**).

Comment 73. [In addition to the necessary State Legislation, there are three New York City Council bills needing passage.] Int 1202-2025. A local law to amend the administrative code of the city of New York, in relation to prohibiting the installation of artificial grass in city parks. This bill would prohibit the Commissioner of Parks and Recreation from installing artificial grass in New York City parks, with the exception of repairing or reconstructing artificial grass installed prior to the effective date of the bill. (See attached Fact Sheet) ... The first bill alerts the public to the little known problems of artificial grass, which carries multiple health risks as well as waste issues. (See reference).²⁹ (Beyond Plastics Queens)

Response 73. Public safety is always NYC Parks' top priority, and the agency follows all guidelines to ensure that materials used are tested and approved by experts. NYC Parks seeks to offer a variety of recreational field surface types to the public so visitors can enjoy all of the important physical, emotional, and mental health benefits provided by active recreation. DEC's Extended Producer Responsibility for Carpet Law went into effect on December 28th, 2024. Artificial turf is subject to the law's requirements: producers must fund a convenient collection program at no cost to New York State consumers, achieve increasing recycling rates, phase out PFAS chemicals in the production of new carpet (and artificial turf), and manufacture new carpet (and artificial turf) with increasing percentages of post-consumer recycled material. The law also sets specific goals for closed-loop recycling that will lead to the development of a more circular economy for the industry.

Textiles

Comment 74. Summary: DSNY should establish textile best practices that prioritize non-fossil-fuel derived textile procurement for City agencies and the development of programs and policies that incentivize the

manufacturing and processing of bio-based textiles (not derived from fossil fuels) in the New York City region.

Response 74. DSNY appreciates the support for DSNY’s current investment in improving textile purchasing practices in New York City and the continuation of this through **Strategy 5**, provide guidance on textiles used by agencies for evaluating material choices, offering end-of-life options, and including opportunities to reduce overall consumption, and **Strategy 6**, launch pilot projects to increase access to reuse and repair for textiles procured or mandated by the City. DSNY agrees with commentors that there is value in developing a regional, circular, and regenerative textile economy, and that benefits include workforce development opportunities. As part of best practice guidance, DSNY will provide input on evaluating material choices (considering material origin and goals to reduce fossil-fuel derived textiles, as well as durability and safety of personal protective equipment). DSNY will also provide guidance on end-of-life options for textiles and opportunities to reduce overall consumption. DSNY revised *SWMP26* to include this information.

Detailed Comments

Improved collection and reporting are important, but real change demands a fundamental shift in the production of textiles, away from fossil-fuel based, unrecyclable plastics, and towards safer and locally sourced regenerative materials. Crucially, the Draft Plan commits DSNY to working with the Department of Citywide Administrative Services and other agency procurement teams “to direct best practices for New York City’s textile procurement and end-of-life management.”³⁰ By prioritizing the purchase of local, non-toxic, non-fossil fuel-derived textiles, DSNY has an opportunity to use these best practices to change the status quo, help bolster the market for regenerative textiles, and lead by example. Just Zero urges DSNY to amend the Draft Plan to specify that these procurement best practices shall be used, where possible, to move New York City away from the purchase of fossil fuel- derived textiles. (Just Zero)

The Healthy Textiles Coalition appreciates the attention paid to textile waste reduction and textile reuse in the Draft 2026 Plan. However, increasing textile diversion and reuse will not, on their own, minimize the impact of textile production and disposal on our climate or on environmental justice communities. We urge you to amend the Draft 2026 Plan to prioritize rebuilding a regional, natural, and biodegradable fiber industry that supports safe working conditions, healthy communities, and circular, low-impact production systems. (The Healthy Textiles Coalition)

We particularly commend DSNY’s inclusion of goals that align with the New York City Local Law 112 Task Force, which authored the 2024 report, *Achieving Impact Reductions on Textile-Based Goods Purchased by the City of New York* ... The goals of this *SWMP26* initiative to advance textile reuse and reduce textile waste are consistent with the task force recommendations for City procurement ... These goals mirror many of our members’ guiding values—particularly the emphasis on reducing total volume, extending product lifespans, and advising on material composition to minimize impacts across the supply chain. We encourage DSNY to build upon these recommendations by considering the material origins of textiles, and add to the Draft 2026 Plan an evaluation of opportunities to reduce the City’s reliance on fossil fuel-derived textiles. (The Healthy Textiles Coalition)

When investment is directed toward regional textile processing and manufacturing capacity, while supporting localized labor, high quality jobs and ethical production, it strengthens local and rural economies, enhances public health, and improves environmental outcomes ... The Healthy Textile

Coalition urges DSNY to amend the Draft 2026 Plan to include strategies to incentivize and support natural, non-fossil fuel-derived, fiber manufacturing and processing in the New York region. This approach would present a unique opportunity for DSNY and the city to lead in developing policies that connect waste reduction with workforce development, labor protections, and equitable local economic systems. A resilient textile economy should not only divert materials from landfills but also: Sustain quality local jobs and fair labor conditions, reduce toxic exposures for workers and communities, and regenerate the landscapes that supply our natural materials. (The Healthy Textiles Coalition)

We also urge you to consider adding to the Draft Plan strategies, including legislation, financial incentives, and pilot programs, to help support non-fossil fuel-derived, non-toxic, textile manufacturing and processing in the New York City region. A transition away from plastic-based textiles that damage our climate and environment, and that obstruct textiles recycling, necessitates a ground-up reenvisioning of how, and where, textiles are produced. By working to develop policies and practices that support a resilient, climate-friendly, non-toxic textiles economy, DSNY can help reduce textile waste while also sustaining local jobs and reducing toxic exposures. For more information on how DSNY can amend the Draft Plan to prioritize a regional, natural, and biodegradable fiber industry, we encourage you to consider the recommendations in the comment letter submitted by the Healthy Textiles Coalition, of which Just Zero is a founding member and signatory. (Just Zero)

Comment 75. At FABSCRAP, we have diverted more than 2 million pounds of textile waste from landfill, and we have self-scaled to provide textile reuse and recycling services to over 900 clients with the support of more than 11,000 volunteers. We are proof that when industries are given easy, accessible, and financially viable options, real change happens. We are proof that when New Yorkers are given clear pathways, infrastructure, and support, they show up—again and again. And we are proof that waste management works best when it is built with innovation, urgency, and community engagement at its core. (FABSCRAP)

Response 75. DSNY appreciates the role that FABSCRAP plays in resource recovery in New York City and recognizes the value of financial viability, innovation, and community engagement in accomplishing textile diversion.

Comment 76. Summary: Expand opportunities for, and improve access to, textile collection, reuse, and recycling, especially through increased residential textile collection.

Response 76. DSNY appreciates the support for textile recovery legislation. As part of **Initiative 1.1**, advance textile reuse programs and reduce textile waste, DSNY will work on strategies that would support future potential legislation on collection and diversion of textiles. DSNY is also committing to expanding its current Textile Collection Program (formerly refashionNYC) to low rise buildings. In addition, DSNY offers textile collection events in every district every year (59 total events).

DSNY acknowledges the challenges and barriers to participation associated with DSNY's current residential textile program, including building eligibility, building infrastructure limitations, accessibility to textile drop-offs in residential buildings, and physical challenges associated with transporting textiles. DSNY will take into account the concerns shared about the existing textile program in establishing textile collection options for all city households and residents. DSNY

recognizes the importance of education and outreach and will include education on textiles as part of the *SWMP26* Education and Outreach Program.

Detailed Comments

NRDC recommends, among other things, that the Draft *SWMP* be revised to include the following measures that are needed to cut back on the growing problem of throw-away plastics in our waste stream ... Add commitments to: Introduce City Council legislation to provide collections of textiles for recycling to all city residents—either via expansion of the current RefashionNYC bin program to all multi-story residences, or through the addition of periodic curbside textile collection days. (NRDC)

Mandate textile recovery. (E. Cooper)

Legislation is needed to ban textiles from trash, but we need robust programs set up and ready to accept, sort, and repurpose the huge volume of textile resources such a ban would produce. (Silbermann)

I wanted to share my story of trying to get my building registered for reFashionNYC, in the hopes that it will inform how you approach this next phase. For context, my building is a small townhouse-style co-op building of 10 units (5 floors, 2 units per floor). It's also an old building, built in the late 1800s. I got all the way through the process of registering us, and we were ultimately stymied by the size of the bin that we were going to be required to use. Even the "small" bin that was offered was too large for our basement—technically it could fit, but we couldn't find a spot for it where it wouldn't be either impeding building operations (trash removal, access to meters), or dangerous (touching the boiler!). So even though my building is technically on that threshold of buildings that you've already expanded access to on paper, I would like to respectfully submit that the work on making it truly available to buildings of my size is incomplete, and it would be great if we could be offered an alternative solution to the "small" bin that is currently the only available container. (Callahan)

The Draft Plan aims to reduce and divert this textile waste primarily by expanding the City's existing textile collection program, increasing participation in the program, and improving commercial sector reporting on textile waste, collection, reuse, and recycling.³¹ These strategies can provide crucial assistance in diverting textile waste from landfills and incinerators, however on their own, they will not address the underlying barriers to preventing textile waste. (Just Zero)

We support DSNY's goal of increasing awareness and accessibility of textile recycling efforts, including establishing textile collection options for all city households and institutions, with additional events and appointment-based pick-up for low-rise buildings ... which were previously excluded from collection programs. (NYLCV)

Textile recycling for everyone. The public cannot go into a big building to drop off textiles in their recycling. What do people in small residential buildings do? Carrying textiles to a drop off site is impractical. If/when we have curbside big bins instead of individual small bins, one could be for textiles with a label and with a picture. (Ryan)

In NYC, textile and apparel waste (from residential collection only) is 6% of the MSW, totaling between 155,000 -200,000 tons annually (after all donations, swaps, and reFashion program collection). NONE of this gets separated and evaluated for resale, repair, redesign, donation, or

recycling. ALL of it is either landfilled or incinerated. 310-400 MILLION POUNDS of re-usable textiles poisoning ground water and soil in landfills and emitting methane for the next 200+ years, or spewing toxins into the air from burning, much of it in EJ communities. Approximately 85% of this could become part of the circular economy through recycling, repair, resale, or donation, but first it needs to be separately collected and remain dry. This is where DSNY can play the largest role in postconsumer textile waste circularity. This is the why and how to engage residents to participate in coordination with DSNY in the recovery of textiles upstream BEFORE THEY BECOME WASTE! Convenience in waste recovery is essential to both participation and diversion in NYC. If we expand this, a textile disposal ban would be plausible. Boom; 6% of NYC's MSW reduced and repurposed into the circular economy! (Silbermann)

I commend DSNY's reFashion bin program which is designed to collect residents' textile and footwear discards in buildings with 10 or more units, but this only covers a tiny fraction of those size buildings and leaves out millions of NYers who don't. As for its success, as of 2024, only 2460 of NYC's 99,395 10+ unit apartment buildings have these bins. That's only 2.4% of buildings with 10+ units! Why hasn't this program already expanded to cover more NYers in all building sizes in the almost 15 years it's existed? The reFashion program is planning to expand 10-fold, but the funding for such growth (the cost of bins and staffing requirements) limits the speed of this. An effective plan must be backed with sufficient budgets and appropriate municipal supervision that will help contract partners with the necessary financing and support to facilitate speed of expansion to realize our LEGISLATED circularity goals. Goals of 100% capture by 2030, NOT 30.5% by 2036 as this "plan" puts forth! (Silbermann)

Curbside really feels to me like the best route to achieving a robust textile recycling program at scale. Textiles are heavy, and I think even if events were expanded or collection at Greenmarkets is expanded, there is always going to be a significant amount of people who are excluded from being able to participate simply because getting bulky items like a duvet stuffed into a ... bag across town is just not easy. (Callahan)

Textile recycling needs to be elevated immediately in Environmental Justice communities. I have too often seen ripped open garbage bags on sidewalks in my neighborhood in Harlem with textiles that have been discarded and then spread across the street. There needs to be a shift in behavior and attitudes on how New Yorkers can separate materials that are valuable and should not be burned or landfilled but can have a second life. (Dookie)

DSNY should ramp up outreach and education efforts when it comes to building awareness of the Department's ReFashionNYC program, which works in cooperation with partners like Housing Works and Wearable Collections to offer textile recycling to New York City apartment buildings of ten or more units. (NYLCV)

Comment 77. It's odd to think textiles should be characterized as "Special Waste." There is nothing closer to you right now than the clothing you're wearing. Clothes are NOT single-use items yet are increasingly being treated as short-term, cheap purchases that are all too easily tossed in the trash (like packaging) to be replaced with something new and trendy. Pre-consumer and industrial textile waste is a commercial stream and covered under source separation recycling requirement. (Silbermann)

- Response 77.** DSNY would like to clarify that textiles are not characterized as special waste. The Special Waste Program **Initiative 7.2**, expand community events and centers, includes the following statement: “In accordance with Local Law 88 of 2023, DSNY expanded the hours of its Special Waste Drop-Off Sites to every Thursday, Friday, and Saturday from 9 a.m.–5 p.m. and added a textile drop-off location in every borough.” Special Waste Drop-Off Site expansion is separate from the expanded textile drop-off program, but both are required under Local Law 88 of 2023. These drop-off programs, as well as compost giveback programs, were mentioned in this section to describe DSNY’s existing community events.
- Comment 78.** Place textile collection bins at schools to collect unwanted clothing from lost and founds and clothing drives, with the potential for families to drop off items too. (Sacks)
- Response 78.** DSNY hosts 30 textile collection bins at New York City schools. DSNY will expand its community reuse and recycling events to include the collection of other materials, such as textiles and paint.
- Comment 79.** [There are] many businesses now that address mending and alterations but they receive little to no fiscal support. (Silbermann)
- Response 79.** DSNY acknowledges that mending and alteration can reduce textile waste. DSNY includes several repair locations on its donateNYC directory under “Fix” in the dropdown menu.
- Comment 80.** We support DSNY’s goal of improving enforcement of the recycling requirement for businesses whose waste is made up of more than 10% textiles. (NYLCV)
- Response 80.** DSNY appreciates the support for **Strategy 3**, to establish guidelines for commercial and industrial textile reporting to aid in the enforcement of recycling mandates for businesses generating more than 10% textile waste.
- Comment 81.** Textiles Collection and Sorting: The Draft Plan endorses expansion of NYC’s existing textile collection program ... [but] seems to stop short of considering the next steps in the value chain ... sorting and preparation ... Based on our studies with the City of Los Angeles, we share our thoughts on how DSNY might extend their proposal to learn and engage stakeholders further along the value chain. [Textile collection] should be paired with local sorting and preparation infrastructure capable of supplying recycling-grade feedstock. A growing share of collected textiles is non-reusable but technically recyclable. Without dedicated sorting capacity, these materials risk being landfilled, incinerated, exported, or stranded in the system ... [New York City should] pilot textile sorting and recycling infrastructure that directly links collection efforts with downstream recycling solutions. Global experience shows that when recycling technologies scale without sorting infrastructure, recyclers struggle to access consistent feedstock. (TOMRA)
- Response 81.** DSNY will continue to monitor developments in textile recovery technology as part of implementation and ongoing program development.

Organics Diversion and Recovery Program

Curbside Organics Collection

Comment 82. Many residents of Queens ... complain that their building does not comply with the curbside organics collection law. Their building either doesn't provide a bin for them to deposit their organics, or the bin they provide is insufficient to contain all of the organic scraps collected. (Latham)

Buildings that do provide a bin complain that their brown bin often gets missed by DSNY during collections ... This seems to occur most frequently with the first or last building on a block. It's happened to my building repeatedly. (Latham)

Response 82. All New York City residents are required to separate food scraps, food-soiled paper, and yard waste from trash. Owners and property managers of buildings with four or more units must also provide a designated storage area with clearly labeled compost bins. Anyone who notices residential property owners, managers, supers, or tenants not doing their part to separate compostable material from trash, can request a DSNY training, presentation, or site visit; direct non-compliant parties to DSNY's training webinar for building staff; volunteer to help manage the building's compost bin; and/or report a residential building mixing trash with compostable material. Missed trash, recycling, or compost collections, as well as buildings that are not separating organics can be reported through NYC311.

Comment 83. I am proud of our city's accomplishments of creating a viable composting program, and I am here to enthusiastically push us to keep improving. I know that I speak on behalf of my community and the thousands of supporters of our organization, when I say that programs like organics recycling, that are accessible, are a climate win that benefits everyone. (McGillivray)

We believe strongly in the role of food waste mitigation and reducing the amount of food ending up in landfills ... We commend DSNY for its leadership in expanding citywide organics collection and for measurable increases in diversion through the Citywide Residential Organics Program. These efforts represent meaningful progress toward the City's waste reduction and climate goals. (NYFWAN)

Response 83. As part of SWMP26 implementation, DSNY will work to further strengthen the organic diversion and recovery initiatives.

Comment 84. Summary: SWMP26 organics program should commit to phasing out the use of plastic bags for organics collection and instead promote or mandate the use of compostable bags or reusable containers.

Response 84. It is true that plastic bags are a large source of contamination in the organics waste stream and that phasing them out would improve quality of separated organics and compost. DSNY's goal is to facilitate compliance with the citywide program by making it more convenient and flexible for residents before imposing alternatives to plastic bags. Further, at the Staten Island Compost Facility, DSNY uses a machine depackaging system to separate organic materials from non-

compostable bags. DSNY also makes leaf bags and kitchen containers available at compost giveback and other events as funding allows.

Detailed Comments

I advocate for the use of certified compostable bags in the collection, hauling and composting of kitchen food scraps. Households need an easy hygienic tool and haulers benefit from a no-mess experience. Certified compostable bags breathe, expelling moisture and preventing the build-up of anaerobic sour odors/juices which cause an unpleasant experience. Since food scraps collected in a certified compostable bag undergo a 10% weight reduction through moisture loss, the effect saves haulers in road/tire wear and fuel use. Currently, households may use a plastic bag to collect food scraps in New York. This seems illogical given that there is an option to use a certified compostable bag. While plastic bags might end up in the landfill, any contaminants dropped in compost end up in the soil. For all composters, the number one contaminant is plastic bags. In cities where only compostable bags are allowed, this contaminant simply does not exist. (Novamont).

Add commitments to develop a schedule for phasing plastic bags out of the process for collecting residential and commercial organics. (NRDC)

Change “Study alternatives to clear plastic bag bin liners for organics collection” to “Phase out the use of clear plastic bag bin liners for organics collection in all DSNY-managed programs by 2028; Implement and scale up proven alternatives such as paper bags, reusable containers, and collection methods to reduce contamination of compost ... Establish guidance outreach, and operational support to assist buildings and residents in transitioning away from plastic bag liners for organic waste. Monitor and report progress annually with specific contamination rate targets ...

Change “Promote the use of paper bags for leaf and yard waste collection” to “Mandate the use of paper bags or reusable containers for all leaf and yard waste collection in DSNY-managed programs by 2026. Prohibit the use of plastic bags specifically for yard waste, and provide training, technical assistance, and support to residents and landscapers to facilitate compliance.” ... Expand bulk procurement programs for paper bags and containers, distribute them to priority communities, and monitor implementation to ensure contamination rates are reduced annually ...

DSNY’s proposed strategy to “study alternatives to clear plastic bag bin liners for organics collection” is insufficient given the ten-year lifespan of this plan and the urgency of the *Solid Waste Management Plan (SWMP)*. While we understand the necessity of studying alternatives, data now shows plastics—including plastic bags and liners—remain the largest source of contamination in organic streams, undermining compost quality and increasing downstream costs for processing facilities. Multiple studies and the city’s own waste characterization data have clearly identified this as a universally recognized barrier. Composting stakeholders and facility operators have repeatedly voiced the need for standardized, non-plastic separation methods, and the City’s own program experience shows that paper bags, bin washing, and reusable liners can all be deployed now—not after another multi-year review. (EANY)

Comment 85. One of the issues we have is the amount of organic material going into landfills, and a lot of that, I believe it was 15% of it in Queens, is yard waste ... If they were required to use clear bags instead of the black bags that they use, the clear bags would be going to the compost pile as opposed to the black bags they use that all go to landfills. (Queens Community Board 10)

- Response 85.** As part of *SWMP26 Strategy 24*, DSNY will promote the use of paper bags for leaf and yard waste collection, which will help address the concern that yard waste is not being composted because of the way it is bagged and set out for collection.
- Comment 86.** Without participation from each residential kitchen, with each household separating its food scraps, there can be no program, no greater goals, only theory. (Novamont)
- Response 86.** Participation is crucial for the success of the Citywide Residential Organics Program. DSNY will continue to use a combination of education, outreach, and enforcement to increase participation through the implementation of the Education and Outreach Program.
- Comment 87.** Providing free kitchen food scrap containers would increase participation. DSNY started to do this in the first few pilots and then abandoned it. Why? (MSWAB)
- Response 87.** DSNY currently provides free kitchen food scrap containers at compost givebacks and other community events. As part of **Initiative 8.3**, collaborate with community groups on outreach and education for organics recycling, DSNY will conduct joint outreach activities providing kitchen containers to the public for free. DSNY will also make kitchen containers available at compost givebacks as funding allows.
- Comment 88.** Considering that organic materials make up an estimated 35-40% of municipal trash, and that recyclable materials make up an estimated 32% of municipal trash—or about 70% of the total waste stream—I don't understand why DSNY doesn't flip its current collection schedule. Instead of collecting black bag trash 2 x per week, and recyclables and organics 1 x per week, why not reverse it—collect recyclables and organics 2 x per week, and black bag trash 1 x per week. DSNY is already making two pickups per week, and it already has the dual sanitation trucks needed to make this possible in its fleet. This would solve the storage issue that many buildings have, and it would help change behavior ... My multi-unit building produces—and separates—far more recyclables and organics than it does regular trash, which we then have to store for a week. (Latham)
- People don't separate their organic scraps because they don't have space to store organic scraps, or they complain that the organics will smell after sitting around for a week and ask why NYC doesn't pick them up more frequently. (Latham)
- What is the cost of adding a second organics collection each week? (Allen)
- In order to maximize participation, it is essential that there be universal, frequent curbside collection for recycling, organics, and reuse. Over time, organics collection should replace—not simply supplement—garbage collection. (MSWAB)
- Response 88.** The quantity of organics collected does not yet require additional truck trips for collection; this will be closely monitored as the tonnage increases. DSNY continuously monitors collection routes for efficiencies, including frequency by material type. **Chapter 4: Existing Administrative and Financial Structure** includes a summary of available information on costs and budgets. Additional information is available from The Mayor's Management Report: <https://www.nyc.gov/site/operations/reports/mmr.page>.

- Comment 89.** DSNY must immediately reinstate the City’s enforcement and fine system as part of Local Law 85 of 2023, establishing a mandatory citywide residential curbside organics program. (NYLCV)
- Response 89.** In April 2025, DSNY paused full enforcement of the Citywide Residential Organics Program for buildings with 30 or fewer units, not issuing fines for noncompliance. Larger buildings that received four warnings were issued fines during this period. Full enforcement was reinstated on January 1, 2026.
- Comment 90.** For compost to be considered “clean,” rigorous testing must be implemented by DSNY to ensure compost is free of toxins like PFAS, especially from compostable products like silverware, dishes, etc. Whilst we commend DSNY on their actions thus far to separate contaminants from compost, additional action is needed to protect the health and quality of our compost supply. Based on agency information that is public and available, DSNY is not testing curbside organics for toxins beyond those required by the US Composting Council's Seal of Testing Assurance (STA) program. (EANY)
- Response 90.** DSNY follows all regulatory requirements regarding compost quality for general distribution, testing both for STA and DEC requirements. DSNY will continue to educate residents and agencies regarding best practices for participating in the Citywide Residential Organics Program to minimize contamination. In addition, as part of **Strategy 29** and **Strategy 30**, DSNY will continue to pursue innovations in the use of processing technologies to maintain compost quality and increase the recovery of compostable materials.
- Comment 91.** The *SWMP26* can have targeted diversion efforts and education. Manhattan sends its refuse to Reworld Essex (Districts 1-4, 7, 9, 10, 12). District 12 (Inwood) sent the highest volume of waste to Reworld Essex in 2024 compared to the other Manhattan districts, while its curbside compost participation rate is on the lower end at 4%, so there is a major opportunity for organics diversion efforts. (ICC)
- Response 91.** DSNY agrees. *SWMP26* includes **Strategy 122**, conduct neighborhood walkthroughs with community partners and elected officials to observe area conditions and apply targeted outreach.
- Comment 92.** Figure out how to make brown bins work for large multifamily buildings, including: 1. Promote and assess use of equipment in buildings to pre-process organic waste or turn it into fertilizer (like Harp in the Peninsula and Chestnut Commons, or BioGreen 360 in commercial buildings). 2. Work with buildings to pilot different options for on-floor containers, such as a caddy swap, providing biobags and caddies, or more education—and evaluate for capture rates and quality. (CZWD)
- Response 92.** DSNY supports building efforts to improve organics collection and setout through outreach and education, such as the Clean Buildings Training Program, and will continue to offer those and other targeted programming. As part of *SWMP26*, DSNY will explore innovations in setout and collection equipment and operations to improve the quality of organics and initiate a stakeholder engagement process on organics processing capacity in which pilot programs can be considered.

Composting

Comment 93. Summary: City Council should pass Intro 696, requiring the establishment of composting facilities in each borough. Local composting facilities would benefit communities through job creation, high-quality compost, and reduced traffic and pollution.

Response 93. *SWMP26* includes a number of strategies to expand composting in New York City. Per Local Law 118 of 2024, DSNY will establish eight new composting locations and upgrade, as necessary, 17 existing facilities. DSNY will continue to monitor the existing capacity for each organic substream (e.g., food scraps, leaf and yard waste, trees) and plan for adequate future capacity through *SWMP26* biennial reports to DEC. DSNY will also initiate a stakeholder process for organics processing capacity. As part of *SWMP26* **Strategy 34**, DSNY will initiate the organics processing capacity stakeholder process, inclusive of various scales of processing and transportation modes. As part of that process, DSNY will work with City Council and City agencies. The City is clear in its intention to expand composting capacity citywide.

Detailed comments

Intro 696 would establish organic waste composting facilities in every borough. The ... bill would allow trucks to travel shorter distances to borough sites, lowering emissions. These local sites would create better finished compost that can be used in parks and sold to landscapers. (Leonard)

We urge the City Council to pass Int. 696, requiring the city to establish at least one compost site in every borough. These processing sites will produce high-quality compost, create local jobs, and reduce pollution from truck traffic in communities with waste transfer stations. We support the SWAB's recommendation that community composting sites be included in the rollout of Int. 696. Community Composting organizations have been the backbone of organics recycling in the city funding for them should be increased and baselined in the annual budget. (350 NYC)

Add commitments to: 1. Significantly expand in-city composting processing capacity; 2. Analyze available sites for actual composting operations (Brooklyn Borough President Antonio Reynoso's recent study is a good place to begin); 3. Support passage of Councilmember Sandy's Nurse's legislation to boost composting processing in every borough. (NRDC)

We need more composting facilities, not less. We lost ... a phenomenal site in Long Island City, Big Reuse, because we don't have a system in place to support this composting site. We are down to two mid-scale sites in New York City. One of them is on Governor's Island, and the other one is here at Queens Botanical Garden. I would like for us to have at least one site in every borough. And that is why I and Queens Botanical Garden are big supporters of Local Law 696-2024, introduced by Councilmember Sandy Nurse, that if put into place, it would mean that they have at least one composting site in every borough, because let's face it, we [produce] tons of waste on a daily basis. We produce 44 million pounds of waste; that is residential and commercial waste. And we are not handling our waste at all. We have this approach of getting rid of it and then forgetting about it, and we really need to be hyperfocused on how we are recycling our organics. (QBG)

Comment 94. We acknowledge and support the planned expansion of composting infrastructure, including the creation of new composting sites and upgrades to existing facilities. Building out local and citywide processing capacity is essential to ensuring the long-term success of mandatory organics

collection. MCB4 looks forward to continued updates on siting, capacity, technology choices and opportunities for community partnerships. (MCB4)

DSNY will thus need to identify sites within the five boroughs where organics can be processed through traditional composting methods. Composting locally has economic benefits for our communities, avoids the environmental pitfalls of co-digestion, and presents the opportunity to site facilities more equitably. Doing so will require inter-agency coordination, especially because, as the 2026 Draft notes, “The shrinking of manufacturing zones with vacant parcels has made it more challenging to site waste infrastructure.” DSNY should begin collaboration with the Department of City Planning to ensure that future plans include sufficient space to support such facilities in all five boroughs. (Reynoso)

... the Plan states that DEP will work with DSNY and MOCEJ to develop plans to expand organics codigestion capacity and biogas recovery, with the potential for biogas infrastructure on City property. Is DSNY also working with MOCEJ to do the same to expand actual composting? (Allen)

Response 94. Ensuring adequate organics processing capacity will be an ongoing part of SWMP26 implementation. As part of *SWMP26 Strategy 34*, DSNY will initiate an organics processing capacity stakeholder process inclusive of various scales of processing and transportation modes. DSNY will continue to engage with Parks, MOCEJ, and other City agencies as part of this process to expand options and capacity for organics processing, including composting. Additionally, DSNY will work with Parks to establish eight new composting locations and upgrade, as necessary, the 17 existing facilities per Local Law 118 of 2024 (**Strategy 35**). DSNY will also continue to support community composting (**Initiative 2.7**).

The City of Yes for Carbon Neutrality Text Amendment resulted in two changes to the City’s Zoning Resolution [ZR] that aim to enhance the city’s composting capacity: 1) it clarified that small-scale composting can be considered an “accessory use” in commercial and residential districts and that composting can be conducted at any scale in all manufacturing districts (so long as applicable performance standards are adhered to, per ZR 42-143); and 2) it allowed recycling and organic material receiving facilities of up to 5,000 square feet in all commercial districts.³²

Comment 95. Summary: Composting offers residents, communities, and the environment many benefits, and community composting organizations have great value. DSNY should expand *SWMP26* composting programs and support of community composters.

Response 95. DSNY and NYC Parks agree that composting has a wide range of benefits, including environmental, economic, environmental justice, community, and educational, and have partnered with nonprofit organizations to support community composting for decades. The following *SWMP26* initiatives are included to advance composting (including community composting), local use of compost, and outreach and education in collaboration with community stakeholders:

Initiative 2.3: Increase composting and wood reuse.

Initiative 2.6: Increase in-city use of organic-derived products.

Initiative 2.7: Continue to support community composting.

Initiative 8.3: Collaborate with community groups on outreach and education for organics recycling.

DSNY and NYC Parks believe the Organics Diversion and Recovery Program can truly only be successful when supported by a diverse, inclusive, and comprehensive network of collection logistics, processing facilities, and educated participants. DSNY agrees that community composting would not reach the scale needed to process the large amounts of tonnage generated citywide.

Detailed Comments

It is heartening to see DSNY codify its commitment to supporting community composting. These facilities play a critical role in a comprehensive organics diversion system by: diverting millions of pounds of food waste from landfills every year; providing free compost to the Parks Department, community organizations, street tree maintenance, school gardens, Botanical Gardens, and community gardens; creating jobs; and playing a critical role in educating youth and the public about the value and mechanics of composting. (Reynoso)

We advocate for mandatory recycling and community-wide composting. Removing the organics from the waste stream. (CRCQL, Mayfield)

Composting undertaken at the local level—Community Composting—offers additional benefits to the city and its residents. Not only do decentralized small- and mid-scale composting facilities mean less waste-related traffic and transportation-related pollution, but they are operations that bring people together, introduce kids to nature, and help revitalize city neighborhoods. As the experience in Seattle demonstrates, when composting reaches critical mass, it can save taxpayers funds—especially when compared to the roughly \$500 million annual cost of exporting our trash to out-of-city incinerators and landfills. (NRDC)

The benefits of using compost for green infrastructure, climate adaptation, urban agriculture, limiting exposure to urban soil contamination, and STEM education is of tremendous value ... (Pace University)

Better composting programs to keep organic food scraps out of landfills, which ultimately reduces methane pollution and creates local jobs and robust, real recycling programs ... (Seneca Lake Guardian, Taylor)

Food-scrap should be safely transformed into a compost that enhances soil health. Aerobic composting of food waste creates a safe soil amendment that contributes to soil health. (CAAN)

Enhance and expand commitments to composting organic waste: composting of organics—food scraps, yard waste, and food-soiled paper—must become the Sanitation Department's disposal centerpiece to achieve a sustainable, affordable, and neighborhood-friendly waste policy in New York. [Turning] those discards into finished compost that can be applied as a natural fertilizer, soil stabilizer, and supplement that helps crops, street trees, and house plants grow and remain healthy. (To be sure, composting strategies should always come into play after intensive efforts to reduce the amount of food waste generated in the first place.) (NRDC)

The City should strengthen partnerships with local community composting initiatives and align new organics hauling and processing contracts with the Community Hiring Initiative³³ to prioritize residents from historically underrepresented and overburdened neighborhoods. Embedding local workforce training, clear labor standards, and equitable job access within food waste and organics programs will help ensure that the transition to a zero-waste city not only protects the environment,

but also supports the communities that have long borne the impacts of the waste system. (NYFWAN)

We must remember that organic collections have been happening since the 1990s, and maybe even earlier, in a decentralized system. Thanks to the Compost Project from DSNY, groups like LESEC, Earth Matters, Big Reuse, the Botanical Gardens, and, we will even say GrowNYC, were able to maximize community engagements for community diversions and community composting, which I believe has been the key to the success of the Organics Mandatory Program. Because of the support and emphasis of community engagements, other groups were able to emerge to help continue the passion of direct impact for Environmental resiliency and social justice. Groups like Compost Power, GreenX, Feen Bk Rot, East NY Farms, Red Hook Farms, Cafeteria Culture, The Brotherhood Sister Sol, and more ... it's not just taking our efforts and riding away with it, it's taking our livelihood, and not respecting our equal outcome in sustaining our planet, our communities, and our families. Make us an equal partner on this Solid Waste Management Plan, and provide us a stable source of income to help reach the NYC Zero Waste Goal. BroSis is leading an initiative to increase 1000 composting systems in every borough of NYC to help increase community engagement, green jobs, and environment resiliency for residents of all ages in NYC. (The Brotherhood Sister Sol)

Regarding NYCCP [New York City Compost Project], it seems like DSNY is interested in keeping the status quo/BAU, when many would advocate to expand it. The plan indicated that determining the capacity of NYCCP was challenging. Can DSNY take on that challenge, even if the result is a range for each site? Same for community gardens that compost. It is very important to understand the full capacity that already exists with current community composting infrastructure. Who can do that? (Allen)

Any future framework must begin from an honest assessment of institutional track record. The network of community composting organizations that has existed in New York City since the early 1990s has more than proven its durability and capacity. [Community compost organizations have] continued to process material, train workers, educate residents, and deliver real environmental and community benefits under conditions that would have shuttered less resilient systems. In recent years the City—most notably through the Parks Department—has sought to displace, marginalize, or bureaucratically exhaust these organizations. Such tactics cannot be justified as neutral land management or risk avoidance. They have functioned instead as an active barrier to the very forms of localized organics recovery have always, continuously helped New Yorkers. That posture needs to end, and it needs to end permanently. If New York City wishes to advance a serious organics strategy, it must stop treating community composting as provisional, expendable, or subordinate to wastewater infrastructure. The question is not whether these organizations are capable; decades of evidence answer that clearly. The question is whether the City is prepared to align land use policy, interagency responsibility, regulatory frameworks, and a small portion of its over \$1 billion sanitation budget to systems that have already demonstrated their effectiveness. (MacBride)

The City concentrates waste-related administrative capacity at the expense of residents and community-based organizations. Nonprofit and for-profit enterprises desire opportunities to collect food scraps, compostable paper, and yard trimmings into compost that returns to New York City soils, strengthening soils, plants, and people alike. Sidelining them risks further alienating New Yorkers who—on average—largely ignore curbside and containerized organics mandates and continue to throw valuable food scraps, yard trimmings, and compostable paper into the trash.

While local and community composting will not reach a scale that DSNY aspires to in diverted organics tonnages, it can and should be a far larger portion of the current method of managing organic waste under DSNY's purview, and acknowledgement of this fact must be unequivocal. (MacBride)

I want to address the fact that community composting is [alleged to be] small and inefficient, that the brown bins, community composting, FSDOs [Food Scrap Drop-Offs] are all the same. And none of that can be further from the truth. When Community Composting got defunded towards the end of 2023, the budget director for the Mayor's Office testified several times and did not back down, that community composting is small and inefficient ... I want DSNY to be more aware of the importance of community composting. We are small because of our funding, but we are far from inefficient. We ... close the gap. Where DSNY hasn't been able to service, we are there. (QBG)

DSNY must continue supporting and working with the Community Composting Network and other local organizations to build awareness and change behavior towards organic waste recycling. (NYLCV)

NYLCV supports DSNY's strategy to work with community composters to operate a composting facility on DSNY property in Gowanus, Brooklyn. (NYLCV)

We advocate for support for composting and adequate budget for the municipal program. Community composting groups have so far diverted much organic waste—a critical component of domestic waste output—from landfills where decomposition poses a problem to landfill management, producing leachate which can contaminate surrounding waterways. Instead of posing problems by producing further harmful side-effects, organic waste can be put to good use. It can truly be recycled and reused for healthier habitats for us, for decomposers, and for a broader spectrum of urban wildlife. (JH-SCRAPS)

Since the start of October 2025, with our newly hired Compost Coordinator, over 800 pounds of cafeteria food scraps have been processed locally ... Our recommendation is clear: Increase dedicated funding for community composting; Expand neighborhood-scale composting sites and increase the processing capacity of existing sites. (CafCu)

Community-based and municipal composting programs deliver measurable economic benefits. Composting infrastructure supports local employment across collection, processing, and distribution, creating green jobs that cannot be outsourced and strengthening regional economies.³⁴ Finished compost produced through these systems becomes a cost-effective, locally sourced soil amendment for community gardens, urban farms, and landscaping, improving soil quality, increasing crop yields, and enhancing long-term soil carbon storage. (CSFL)

Composting helps soils become better at absorbing and preserving moisture—in addition to enhancing the organisms and nutrients in depleted urban soils. This ability to absorb water is especially necessary now that we have cycles of drought punctuated by ever more powerful storms. These harsher storms can create runoff that complicates capture for our antiquated sewer system, usually making it so difficult for our system to manage that runoff can regularly pollute our nearby beaches. More absorbent soils help capture storm water, lessening the pressure on our combined sewer system. (JH-SCRAPS)

The composting community along with urban gardeners have much to offer [to the] discussions of waste reduction, sustainability, and resilience. Composters and gardeners can help find innovative

and simple ways to curtail waste and lessen negative environmental impacts on our city. At the very least, we can all help advance better understandings of what is compostable and can bolster the city's program, if not actually close loops locally, as SCRAPS is able to do. We want to support communities across the city by wasting less and composting more for healthier soils and richer microbiomes. (JH-SCRAPS)

Comment 96. Add commitments to undertake a rebuilding and expansion of the Rikers Island composting facility so that it can handle a significant portion of Manhattan's collected organics (NRDC)

We support DSNY's involvement in reenvisioning how Rikers Island could be utilized for climate infrastructure, including more city-owned composting facilities, as well as working with community gardens to improve local composting and job growth. (NYLCV)

The *Draft 2026 SWMP* plan should commit the Department of Citywide Administrative Services (DCAS) and DSNY to expanding composting capacity on Rikers Island and create a City-run composting facility on par with the Fresh Kills composting site, as envisioned by the Renewable Rikers Act of 2021. (TDT)

Response 96. As part of **Strategy 33**, DSNY will collaborate with other agencies in planning for the future of Rikers Island and the related potential for additional composting capacity. In addition, as part of **Strategy 34**, DSNY will initiate the organics processing capacity stakeholder process inclusive of various scales of processing and transportation modes. As part of **Strategy 42**, agencies will continue to evaluate opportunities for co-location of new and innovative wastewater and/or organics waste management infrastructure at City-owned properties, including locations that have been previously evaluated, such as Rikers Island.

Comment 97. The operational implications of smaller-scale, decentralized composting systems need to be addressed directly rather than left unresolved. Micro-hauling and localized collection raise legitimate questions about how such activity interacts with commercial waste licensing, registration, and permitting systems, as well as with existing DSNY collection responsibilities and sanitation worker jurisdiction over curbside material. These are not reasons to avoid community-scale composting; they are reasons to clarify roles, authorities, and boundaries in advance. Failure to do so has repeatedly allowed institutional ambiguity to be used as a rationale for inaction. (MacBride)

[Suggested] Strategy: DSNY will prioritize composting as the leading organics management approach by investing in new decentralized and borough-based composting facilities. (EANY)

Response 97. As part of *SWMP26 Strategy 34*, DSNY will initiate the organics processing capacity stakeholder process inclusive of various scales of processing and transportation modes. Licensing, permitting, jurisdiction, and roles can be further clarified as part of that process. Once material is placed at the curb, by law it becomes DSNY property.

Comment 98. Far greater emphasis should be placed on aerobic composting, utilizing not only the Fresh Kills site, but also the existing and future community composting network ... A sticking point is land. It must be acknowledged that New York City faces real and binding constraints on the expansion of local aerobic composting capacity. Land suitable for composting—whether city-owned or otherwise—is limited, politically contested, and unevenly distributed ... Treating land acquisition

and site development as an implied or residual sanitation responsibility has, in practice, contributed to inertia rather than expansion. (MacBride)

- Response 98.** Composting capacity will be addressed as part of *SWMP26 Strategy 34* (see response to **Comment 97**); however, DSNY acknowledges the challenges of siting and permitting industrial-scale compost facilities in New York City’s dense, urban environment.
- Comment 99.** DSNY should continue investing in composting infrastructure throughout the city, including fulfilling the requirements of Local Law 118 of 2024, which related to establishing composting facilities in parks. (NYLCV)
- Can DSNY work with Parks to support composting in Parks per Local Law 118 by developing design and operations guidelines, providing funding, and encouraging collaboration with community compost organizations and including community food scraps? (CZWD)
- Response 99.** *SWMP26 Strategy 35* is to establish eight new composting locations and upgrade, as necessary, the 17 existing facilities per Local Law 118 of 2024. DSNY will continue to collaborate with Parks and other stakeholders, including community organizations, throughout implementation of the Organics Diversion and Recovery Program.
- Comment 100.** Work with DEP to incentivize more use of local compost on city soils to increase stormwater infiltration. Test, pilot, include it in stormwater guidelines and in Parks and greenspace management practices. Collaborate with State DEC to see whether a statewide policy, like WA Soils for Salmon, can be developed ... Evaluate the benefits to biodiversity in NYC from hot composting (easier with food scraps) that kills invasive weed seeds. (CZWD)
- Response 100.** DSNY, DEP, and Parks will consider these suggestions as part of *SWMP26 Initiative 2.6*, increase in-city use of organic-derived products. As part of this initiative, DSNY plans to consider the use of DSNY compost and other soil amendments on city properties, including landscaped arterial roadways and street medians (**Strategy 49**) and develop performance-based specifications for soils, compost, mulch, and other products (**Strategy 50**).
- Comment 101.** While our research shows that the excavated Clean Soil Bank subsoils mixed with compost can make a viable growing medium (Egendorf et al., 2025, 2018; Walsh et al., 2019), the type of compost used determines the viability of these new “soils” for plant growth. Unpublished data, from a study conducted with DSNY and Earth Matter, funded by the USDA, demonstrates that crops grew significantly greater biomass in composts made by community gardeners than composts created at DSNY Freshkills. DSNY has access to these data we obtained in 2023, but staff were likely unable to give these findings attention when Mayor Adams cut the entire budget for the NYC Compost project months later. (Pace University)
- Response 101.** DSNY, MOER, and other agencies can consider the use of Clean Soil Bank material and compost as a growing medium as part of *SWMP26 Strategy 97* (expand the NYC Clean Soil Bank programs and operations in collaboration with City agency partners), **Strategy 49** (consider the use of DSNY compost and other soil amendments on city properties, including landscaped arterial roadways and street medians), and **Strategy 50** (develop performance-based specifications for soils, compost, mulch, and other products).

Comment 102. As New York City addresses its own solid waste problem, I urge you all to consider that the millions of dollars it costs the city to truck solid waste to our area [Finger Lakes Region] could be alleviated to a large extent by instituting city wide composting. The fraction of garbage that is made up by organics has been estimated to be anywhere from 30 to 50%. And it's the organic component that becomes methane through the anaerobic breakdown of that waste in landfills. (Seneca Lake Guardian, Campbell)

Response 102. DSNY completed the rollout of the Citywide Residential Organics Program (mandatory separation and curbside organics collection for all residents) in October 2024 and will work to increase participation and compliance as part of *SWMP26* implementation. In addition, as part of *SWMP26 Strategy 84*, DSNY will work with New York City Council to expand organics separation requirements to include all businesses and prioritize donation.

Comment 103. The City of Geneva at the north end of Seneca Lake has a pilot program in place that uses vermicomposting. This only works if there is the political will to make it happen and to make it easy for city residents. Geneva is offering free compost buckets for households and, in New York City, it would be necessary to have curbside bins where people can easily drop off the food scraps they collect. They also provide larger containers for institutional generators of waste like schools, hospitals, and food processing facilities. This would be a win win for the city, for the environment, and for communities like ours that are bearing the brunt of the throw away mindset that has been the norm for decades. (Seneca Lake Guardian, Campbell)

Response 103. With the curbside organics program available to all residents, schools, and other institutions, New Yorkers already have a convenient option for managing organic waste. DSNY does not object to households and institutions using vermicomposting instead.

Organics and NYCHA

Comment 104. Summary: Expand NYCHA organics collection, composting, and recycling efforts through new and enhanced programs and collaborations, including with Compost Power, Gotham Food Pantry, and Green City Force. Increase funding and staffing for NYCHA organics diversion and recovery programs as well as inclusion of more specific information in *SWMP26* on increasing organics recycling access for NYCHA residents. Develop and pilot organics collection programs for NYCHA (e.g., shared indoor bins, targeted education) modeled after multi-unit residential programs in other cities.

Response 104. DSNY will increase organics recycling access for NYCHA residents including through community-based solutions (**Strategy 27**). NYCHA is a crucial part of New York City, and an important stakeholder in waste management. NYCHA infrastructure has unique assets, challenges, and opportunities related to waste management and material recovery. DSNY supports NYCHA's efforts to improve setout of materials and increase waste diversion. DSNY provides training, outreach, and engagement for NYCHA staff and residents. DSNY will continue these efforts and will support NYCHA in expanding initiatives to capture additional organic waste, as well as efforts to increase metal, glass, and plastic (MGP) recycling and improve available solid waste management infrastructure and services. Schools and NYCHA are important stakeholders and partners in reducing and managing organic waste. In addition to supporting waste reduction and

material recovery, DSNY, in partnership with NYCPS and NYCHA, will provide opportunities for outreach and education, including on organics diversion and recovery.

DSNY appreciates the support for **Strategy 47** (increase the use of City-produced compost and mulch on NYCHA construction projects and at existing NYCHA development grounds) and **Strategy 48** (provide public schools and gardens with bags of compost for educational purposes).

NYCHA developed a manageable plan with a phased approach that includes leveraging existing solutions (Smart Bins, public drop-off sites), partnerships with local groups including Compost Power and Gotham Food Pantry, and pilots like food waste drop off at community centers.

Detailed Comments

Add commitments to launch a major new composting, recycling, waste-collection program at NYCHA properties, including funding for a significant expansion of the non-profit group Compost Power to facilitate compost collection and processing at additional NYCHA locations. (NRDC)

The *2026 Draft SWMP* seeks to create opportunities for waste diversion for residents of New York City Housing Authority (NYCHA) buildings, most of whom do not have access to brown bins for organics collection ... the strategies laid out in the Draft, innovative programs provide models that DSNY should expand. For example, Gotham Food Pantry partners with NYCHA Resident Associations so that residents attending free food distributions can also drop off their food scraps for composting. This provides an opportunity to educate residents about the value of composting and how to separate their organic waste. Some residents can also drop off at farms and compost sites on their campuses through Green City Force and Compost Power. These models have proven successful, and more residents could benefit from their expansion. (Reynoso)

The plan states that NYCHA will increase organics recycling access for NYCHA residents. How, by how much and by when? This should be a priority that hopefully the new administration will tackle. I did not see any specifics on what next steps would be for NYCHA but a NYCHA plan with more details should be added to the *SWMP*. (Allen)

NYLCV stands with advocates³⁵ calling on the City to expand recycling and organics services to all NYCHA residents, including increasing funding for DSNY and NYCHA staffing and for composting operations like the successful program being run by the non-profit Green City Force at nine NYCHA developments. (NYLCV)

While the plan highlights the challenges of curbside organics collection at NYCHA properties and identifies the substantial volume of waste generated by residents, it lacks specificity on how DSNY will expand access and participation for NYCHA communities. NYCHA residents represent a significant portion of New York City's population, as 1 in 17 city dwellers³⁶ reside here. Addressing these gaps is critical to ensuring equitable access to organics diversion programs and maximizing overall diversion rates. DSNY should provide concrete strategies for expanding organics recycling access to NYCHA residents, including alternative collection methods and targeted support for large or space-limited properties. (NYFWAN)

Recommended strategy: Develop a pilot organics collection programs for NYCHA properties that is modeled after successful multi-unit residential programs, including shared indoor bins, targeted education campaigns, and building-level coordination and advocates to ensure high participation and low contamination ... Several U.S. cities have implemented effective models for organics

recycling in large residential settings that could inform New York City's approach at NYCHA properties. Chicago uses shared indoor organics bins within high-rise buildings, paired with coordinated pickups with private organics waste haulers and community drop-off points to address density challenges. San Francisco integrates multi-unit residential organics collection into its citywide zero waste program, providing color-coded containers, and multilingual education materials to increase participation and reduce contamination. (NYFWAN)

MCB4 is encouraged by DSNY's emphasis on the expansion of composting programs at NYCHA campuses and New York City Public Schools. These institutional settings are critical leverage points for long-term culture change around sorting and organics recovery. Many MCB4 families rely on local public schools, and we have three NYCHA developments—improved organics education, paired with reliable service will advance both climate goals and local cleanliness. (MCB4)

We support DSNY's goal in *SWMP26* to increase the use of City-produced compost and mulch on NYCHA construction projects and at existing NYCHA development grounds. (NYLCV)

Comment 105. Organics separation and diversion would be incredibly beneficial to NYCHA residents, who have long complained about rats and other pests. (Lasky)

Response 105. NYCHA is participating in DSNY's expanded organics collection program, establishing new in-building organics collection (brown bins) at College Point and Leavitt in Queens and supporting sidewalk organics collection bins (Smart Bins) at 39 NYCHA sites across the five boroughs. NYCHA hosts eight farms across the five boroughs with on-site, three-bin compost systems that have been in operation for several years. The food scraps and yard waste collected are processed locally at these sites by Compost Power and Green City Force, and finished compost is provided to NYCHA residents for NYCHA grounds, community gardens, and urban farms. This model promotes a closed-loop system and reduces rodent food sources. In 2022, NYCHA expanded on-site organics collection and processing to non-farm sites at Polo Grounds Towers and Patterson Houses by adding three-bin compost systems built and operated by Compost Power. The expanded sites have started to collect resident food scraps from nearby developments and offer an example of an expanded network of residential food waste diversion options.

Funding, Resources, and Organizational Structure

Comment 106. More details of the marketing plan and a detailed budget on what DSNY will spend should be provided and included in the plan for reference. Some info was provided on page 174 [of the *Draft SWMP26*]. (Allen)

Response 106. The information included on page 174 includes the following: "The expense budget funding for public education and outreach (including organics) in FY23 and FY24 was \$19.4 million and \$14.0 million, respectively. Future spending on public education and outreach is anticipated to be between \$10–20 million annually. No capital expenses are anticipated as part of this budget." The anticipated budget identified is based on prior years' funding. The budget for the Education and Outreach Program has to be approved by the City Council and the Mayor, so DSNY cannot specify the actual amount of funding that will be available throughout the 10-year period.

- Comment 107.** Incentives for building supers, school custodians and cafeteria staff should be offered for maintaining dynamic composting practices. (Leonard)
- Response 107.** DSNY and New York City Public Schools can consider incentives for participation in organics programs as part of the Organics Diversion and Recovery Program and the Education and Outreach Program implementation. Residential buildings are required by law to participate in the citywide organics program and can be fined for noncompliance. DSNY will continue to provide education, training, and other resources to residents, building managers/superintendents, and schools to support participation.
- Comment 108.** The City's composting capacity has not kept pace with new residential and commercial programs to collect source-separated organic waste. We urge that the 2026 SWMP include specific proposals and budget estimates to construct large and medium scale composting facilities across the five boroughs, replicating the success of DSNY's Fresh Kills compost facility. Such facilities could substantially reduce greenhouse gas emissions associated with landfilling, co-digestion, and incineration of organic waste, could make truck routes more efficient and reduce VMT, and have the potential to create hundreds of good, local jobs. (NYLPI)
- Response 108.** DSNY will participate in planning for the future of Rikers Island and the related potential for additional composting capacity (**Strategy 33**) and initiate the organics processing capacity stakeholder process inclusive of various scales of processing and transportation modes (**Strategy 34**), and Parks will establish eight new composting locations and upgrade, as necessary, the 17 existing facilities per Local Law 118 of 2024 (**Strategy 35**). DSNY will develop additional details as part of SWMP26 implementation, and the information will be reported in biennial reports to DEC, which will be posted on DSNY's website.
- Comment 109.** Aborted after the first promising phase of an impressively comprehensive scope of work, a modest investment (\$500,000 or less) in completing the comprehensive study of organic wastes would yield several essential benefits: a complete understanding of all things organic in the city's various waste streams; an inventory and assessment of existing and prospective infrastructure and systems; and information and engagement processes designed to yield consensus about practical and effective solutions for various subcomponents. Completing the study—including its stakeholder engagement components—would minimize the unnecessary and unhelpful sense of competition "food fights"—among various options towards the common goals of prevention/reduction and diversion from disposal to resources. (GS)
- Response 109.** DSNY agrees on the common goals of prevention/reduction and diversion and intends to collaborate with an inclusive group of stakeholders to implement SWMP26, including the Organics Diversion and Recovery Program, while continuing to improve citywide data compilation and maintaining an inventory of organics management infrastructure and its utilization.
- Comment 110.** If the City is serious about developing local aerobic composting capacity, these tasks should be deliberately assigned to agencies whose mandates and skill sets align more closely with land use, open space management, economic development, and intergovernmental coordination, working in structured partnership with community-based organizations that already possess operational knowledge. (MacBride)

Response 110. DSNY will continue to collaborate with other City agencies, including City Planning, Parks, EDC, and MOEC, as well as community composters, to ensure adequate capacity for composting and support small-, medium-, and large-scale sites.

Comment 111. Summary: SWMP26 should include and prioritize funding for, and support the efforts of, community composting programs and partners.

Response 111. DSNY will manage available funding for community composting groups and botanical gardens in the city and collaborate on outreach and education (**Strategy 51**). In addition, DSNY will work with community composters to operate a composting facility on DSNY property in Gowanus, Brooklyn (**Strategy 52**). The budget for the Organics Diversion and Recovery Program and these underlying strategies would have to be approved by the City Council and the Mayor, so DSNY cannot specify what funding would be available throughout the 10-year period.

Detailed Comments

Funding should be prioritized to increase jobs for producing compost, at numerous small-scale sites throughout the city. When the compost is tended to by people in small-scale settings, the quality increases ... [expand] permanent funding for composting jobs. (Pace University)

Community composting is currently funded by City Council—we strongly believe that DSNY should baseline and expand funding for the NY Community Compost Network³⁷ within its own budget and expand education citywide. (CZWD)

We could be collecting a lot more material. This past year, we've collected just under 70 tons of material. We could be collecting a lot more, three times as much, but our staff consists of four people. We're doing work throughout all 19 districts in Queens and some in the Bronx and North Brooklyn ... Sites like Queens Botanical Garden, Big Reuse, Earth Matter, and many other sites like BKROT are actually creating compost and we are giving that compost back to the community, to parks, to nonprofits around New York City and it's incredibly important for us to sustain that and really to increase the funding of compost. (QBG)

Add commitments to support the nonprofit group Compost Power in an expanded program to offer organics processing at 25 of the largest NYCHA developments over the next ten years, supporting efforts to provide green jobs at Compost Power for NYCHA youth, and offering free finished compost to NYCHA gardeners and residents. (NRDC)

Financially support community composters in education efforts citywide. (CZWD)

[Reinstate] community food scrap drop-offs in farmers markets. (CZWD)

Comment 112. Add support for regional use of large volume good quality food scraps—e.g., from commercial food service entities, Hunts Point Produce Market, and elsewhere. We understand that the GrowNYC regional farm hub sends food scraps to drain, and Hunts Point produce market does not separate food scraps from trash ... ensure that there is space for food rescue and donation in the new Hunts Point Produce Market, and in the new city grocery stores. (CZWD)

Response 112. Hunts Point Produce Market does currently separate organics for recovery; DSNY coordinates with stakeholders to increase capture rates and improve the quality of organics. DSNY is working with EDC on the market redesign.

Comment 113. Schools are a significant opportunity to promote organics, recycling, and reuse overall. On page 176, the plan says DSNY will continue efforts to increase [organics] diversion. How much of an increase do you want to achieve? DSNY uses words like “support” (and “continued efforts”), but what is the goal of DSNY’s “support” and how much support will you provide and in what form? (Allen)

Response 113. DSNY’s goal is to maximize diversion of organic materials and not send any waste that can be recovered to incinerators and landfills. Over the 10-year period, the projections included in **Chapter 7** of *SWMP26* (for all DSNY-managed organics) present a reasonable diversion scenario. NYCPS leads the school-related waste reduction and diversion efforts. DSNY will continue to provide technical assistance and educational resources to schools to encourage proper recycling and organics diversion, supplying schools with sorting stations for all material streams and providing posters, decals, and comprehensive education for both staff and students.

Comment 114. As page 142 [of *Draft SWMP26*] shows, the budget on composting was cut drastically FY23-FY24—why and what was cut? (Allen)

Response 114. The budget cut for the composting program from \$8.2 million in FY23 to \$7.1 million in FY24 was part of the November 2023 Program to Eliminate the Gap (PEG), where City agencies were required to reduce City-funded spending to address projected budget gaps. As part of the PEG, funding was cut for numerous programs and budget line items, including community composting.

Comment 115. In May 2021, when the Food Scrap Drop-Off Site run by GrowNYC was still shut down due to the pandemic, we contacted Chelsea Encababian who was working for the Queens Botanical Gardens to set up a volunteer run, Food Scrap Drop Off Site in MacDonald Park ... When GrowNYC reopened their site in December of 2021 in MacDonald Park, again thanks to Chelsea, we partnered with Commonpoint Queens and opened a site by their location in April of 2022 ... When Mayor Adams cut the budget for community composting, we were forced to shut down our site since there was no funding for Big Reuse to haul the food scraps we collected. (Laster)

Response 115. Funding for community composting was cut as part of the November 2023 Program to Eliminate the Gap (PEG). Currently, DSNY manages contracts for community composting sites funded by New York City Council discretionary funding. DSNY will continue to manage available funding for community composting groups and botanical gardens in the city.

Food Donation

Comment 116. NYLCV supports DSNY’s goal to increase the number of donateNYC Food Portal users and the amount of food donated through the portal. (NYLCV).

Response 116. **Strategy 43** has been revised to: “Make efforts to increase the amount of food donated in the city in compliance with Local Law 176 of 2017.”

Comment 117. NYLCV urges DSNY to ramp up outreach and education to increase the amount of donateNYC Food Portal users and donations. (NYLCV)

Recommended strategy: DSNY will support NYCPS's expansion of food rescue initiatives by providing educational materials and resources on maintaining high-quality food donations and ensuring food safety for time/temperature control for safety (TCS) foods. (NYFWAN)

Recommended Strategy: Change "DSNY will make efforts to increase the number of donateNYC Food Portal users and the amount of food donated through the portal" to "DSNY will make efforts to increase the number of donateNYC Food Portal users and the amount of food donated through the portal through outreach and education on food donation laws, benefits, and Food Portal functionality." (NYFWAN)

Response 117. In alignment with **Initiative 2.5**, promote food donation and rescue, DSNY will collaborate with MOFP to increase the amount of food donated in the city in compliance with Local Law 176 of 2017 (**Strategy 43**), expand food rescue initiatives and improve data collection at New York City public schools (**Strategy 44**), support other City agencies in creating food donation programs (**Strategy 45**), and work to increase the amount of food donated for food-insecure New Yorkers by commercial generators of food waste (**Strategy 46**). Outreach and education specific to food donation and recovery will be developed as part of *SWMP26* implementation, in collaboration with MOFP. NYCPS's strategy regarding food donation is to first prevent/minimize food waste through the Offer vs. Serve provision (USDA), then share whole/unopened foods via Share Tables. NYCPS has initiatives in place to donate leftover food as part of the agency's Food Waste Prevention Plan. The Department of Health provides guidance and specifications on school food donations to ensure food safety. Food safety is a top priority for NYCPS.

Comment 118. Summary: *SWMP26* should express stronger and more specific support for donateNYC and other food donation efforts across the city, including engagement with foodbanks and specific metrics to ensure progress and accountability.

Response 118. Initiative 2.5 includes strategies to promote food donation and rescue. The plan has been revised to include the City's intent to work with food banks and pantries. The discussion of food rescue has been revised to clearly state that donation is an important way to reduce food waste at its source and to acknowledge the role of education to encourage residents and businesses to waste less food by donating. Several metrics were identified in **Chapter 6** of the *Draft SWMP26*. The metrics will be further detailed as part of program implementation. The City's goal is to maximize food donation and minimize food waste.

Detailed Comments

While we commend Department of Sanitation New York's (DSNY) leadership through donateNYC's Food Portal, and cross-agency collaboration with the Mayor's Office of Food Policy (MOFP) and New York City Public Schools (NYCPS), this proposed agency strategy requires greater clarity and inclusiveness. Several of the proposed strategies lack sufficient specificity to ensure accountability and measurable outcomes. DSNY's commitment to increasing the number of Food Portal users and the amount of food donated should be supported by clear and measurable actions. (NYFWAN)

Food waste reduction must also be a priority. I did not see much in the plan to support the Donate Food Portal. Again, using words like "making efforts" is weak and disappointing when we waste so much food in the same city with high food insecurity. Please add more details and metrics on the food donation section as well as how DSNY will support, expand and increase the amount of food donated by businesses. (Allen)

[Suggested] Strategy: DSNY will work with food banks and pantries to expand efforts to capture edible food for food-insecure New Yorkers and provide resources and education to encourage residents and businesses to waste less food ... Donation of food is one of the most critical methods for reducing food waste at its source. We commend the action of DSNY and partner agencies thus far in their efforts to increase food accessibility and reduce waste, however the proposed food waste mitigation strategies in the 2026 NYC SMWP do not offer a clear path towards achieving zero waste in landfills by 2030.³⁸ Engagement with foodbanks is not proposed or mentioned and must be brought to the forefront to ensure any actions taken by agencies to not have unintended consequences. (EANY) (Scovell) (Bargholz)

Comment 119. We encourage DSNY to consider incentives for businesses in order to increase donation rates. (NYLCV)

Response 119. DSNY will consider this suggestion as part of implementation of **Strategy 47**, work to increase the amount of edible food donated for food-insecure New Yorkers by commercial generators of food waste, and other strategies under **Initiative 2.5**, promote food donation and rescue.

Comment 120. [Uplifting “A People’s SWMP,” ICC recommends the following:] The 2026 SWMP must commit the Department of Sanitation to expanding efforts to capture edible food for food-insecure New Yorkers and encourage residents and businesses to waste less food. (ICC)

Response 120. The SWMP’s Organics Diversion and Recovery Program includes **Initiative 2.5**, promote food donation and rescue. This includes **Strategy 43**, make efforts to increase the amount of food donated in the City in compliance with Local Law 176 of 2017; **Strategy 44**, expand food rescue initiatives and improve data collection at New York City public schools; **Strategy 45**, support other City agencies in setting up food donation programs; and **Strategy 46**, work to increase the amount of edible food for food-insecure New Yorkers donated by commercial generators of food waste.

Comment 121. To strengthen [the Proposed Strategy: Support other City agencies in creating food donation programs], New York City should institutionalize an interagency food donation working group led by DSNY and the Mayor’s Office of Food Policy to coordinate agency actions, develop standardized protocols, and share data through an enhanced donateNYC Food Portal. Establishing mandatory food waste prevention and donation plans for all agencies with food operations would further embed accountability, ensuring surplus food is systematically tracked, safely donated, and publicly reported in line with Local Law 57 of 2021.³⁹ (NYFWAN)

Response 121. DSNY, in collaboration with stakeholders, will support other City agencies in setting up food donation programs (**Strategy 45**) and maintain and modernize the donateNYC platform (**Strategy 118**). While DSNY does not have the legislative control to commit to incorporating all of the suggested ideas in SWMP26 (for example, mandating food waste prevention and donation plans for all agencies), DSNY will consider the suggestions during implementation.

Comment 122. DSNY should create a dedicated funding mechanism—such as a special-purpose Food Waste Diversion Fund—to help agencies build donation infrastructure, including cold storage, staff training, and partnerships with community food recovery organizations. (NYFWAN)

DSNY should conduct a pilot to capture some of the working, usable refrigerators that are discarded and supply them to mutual aid organizations and community refrigerator programs—or New Yorkers in need. Currently buildings have to call DSNY for pick up after the refrigerant is removed, but many of these are working refrigerators and should not be taken out of circulation just because someone remodeled their kitchen. (Allen)

Develop emergency response protocols for refrigeration outages at grocery and drug stores.
(Sacks)

Help with permanent placing of community fridges, ideally in permanent community reuse centers.
(Sacks)

Response 122. DSNY appreciates the thoughtfulness that went into these strategy suggestions. While some of these suggestions may be out of the scope of *SWMP26*, and DSNY cannot commit additional funding as part of *SWMP26*, these suggestions will be considered as part of the implementation of **Initiative 2.5**, promote food donation and rescue.

Comment 123. Incorporating clear donation metrics into annual reporting, aligned with the State Food Donation and Food Scraps Recycling Law, would improve transparency and measure impact. By coupling interagency coordination with reliable funding and standardized data collection, the City can elevate food donation from a voluntary effort to a durable, measurable system that reduces waste, strengthens community food security, and advances the equitable, zero-waste vision of *SWMP26*. (NYFWAN)

Response 123. DSNY will consider your suggestion in implementing *SWMP26 Strategy 15* (conduct reuse sector research, prepare biennial reports, and include reuse data in city metrics on diversion) and **Initiative 2.5** (promote food donation and rescue).

Comment 124. Summary: *SWMP26* should explicitly advocate for food-date label reform to help reduce food waste.

Response 124. DSNY will coordinate with other city agencies including the Department of Health and Mental Hygiene and the Mayor's Office of Food Policy to explore updated food date label policies and related legislation.

Detailed Comments

Recommended strategy: DSNY and the Mayor's Office for Food Policy will monitor and advocate for New York State food waste prevention policy, beginning with the regulation of food date labels ... Advocating and calling for state regulation of food date labelling is a key action that can be included as a method of source mitigation of food waste. The NYS Food Date Labelling Act (A7291/S7618) simplifies food date labels by limiting language for date labelling to "Best if Used by" and "Use by" to reduce confusion, and requires producers and manufacturers to use scientifically valid methods to estimate food "Best if Used by" and "Use by" dates. Education to New Yorkers is also required to ensure effective implementation, saving New Yorkers money, fighting food insecurity, and reducing methane emissions. The bill does not require the use of food date labels, a manufacturer must only comply if they choose to use food date labels on their packaging. (NYFWAN) (EANY) (Scovell) (Bargholz)

The Plan emphasizes downstream organics management; at times, it overlooks food waste prevention at the source in a holistic and comprehensive manner. One of the most effective ways to prevent food waste is through reforming confusing and inconsistent food date labels. Addressing this problem upstream is essential to achieving the City's zero-waste and climate targets. The New York State Food Date Labeling Act would standardize food date labels, reduce consumer confusion, save families money, and prevent edible food from being discarded unnecessarily. The Solid Waste Management Plan should explicitly commit DSNY to advocating for this legislation and for broader state-level food waste and general waste mitigation prevention policies. Without meaningful engagement at the state level, New York City will continue to manage avoidable waste instead of preventing it. (EANY)

Comment 125. [Suggested] Strategy: DSNY, in partnership with relevant agencies, will advocate for local and state legislation that facilitates the donation of edible, unsold and excess food annually to programs serving food-insecure New York City residents ... Furthermore, DSNY and partner agencies must plan to advocate for actions that go beyond the status quo or are optional. Advocating for legislative and regulatory action is critical and must be part of waste management plans. (EANY) (Scovell) (Bargholz)

We agree with the continued promotion of GrowNYC along with the donation and reuse of goods to increase food recovery. However, the SWMP should commit New York City to supporting comprehensive legislation that facilitates the donation of the tens of thousands of tons of edible, unsold and excess food annually to programs serving food-insecure New York City residents and ensure that grocery and retail stores regularly share information about food for donations on the Donate NYC Portal. (TDT)

Response 125. SWMP26 includes the following agency strategies for food donation: DSNY will make efforts to increase the amount of food donated in the city in compliance with Local Law 176 of 2017 (**Strategy 43**); NYCPS will expand food rescue initiatives and improve data collection at New York City public schools, with DSNY support (**Strategy 44**); DSNY will support other City agencies in creating food donation programs (**Strategy 45**); and DSNY will work to increase the amount of food donated for food-insecure New Yorkers by commercial generators of food waste (**Strategy 46**).

Comment 126. NYLCV strongly supports organic waste recycling as well as reducing our food waste in the first place. (NYLCV)

Response 126. Thank you for your support. **Initiative 2.5**, to promote food donation and rescue, aims to reduce food waste before it's generated. DSNY will also work with New York City Council to expand organics separation requirements to include all businesses and prioritize donation (Strategy 84).

Composting and Codigestion

Comment 127. The 2026 Draft notes that 73% of separated organics collected by DSNY were "recovered for beneficial use," however appears to include co-digestion in that calculation. Because it creates increased emissions and toxic byproducts, co-digestion is not nearly as beneficial a use as traditional composting. To comply with the law, the Final Plan must "describe the amount of organic waste collected and sent to composting facilities to be processed into usable compost" (Reynoso)

The cost for composting is included in the plan but the cost of the Newtown Creek digester, as one example, is not included. This budget is likely included in DEP's budget, but DSNY should provide a cost benefit analysis of making actual composting vs codigesting as part of this plan. DSNY should also provide an update on where the food waste DSNY collects goes. In the last public statement, DSNY indicated that 80% went to Newtown Creek for co-digestion with only 20% turned into compost at Staten Island, but also stated that these numbers would change due to new contracts. Table 24 lists contracts but not organic tonnage exported or processed at each location. DSNY should detail this breakdown in the final SWMP. (Allen)

Organics policy prioritizes co-digestion without equivalent analysis of alternatives. *SWMP26* proposes directing the vast majority of food scraps to anaerobic co-digestion, despite materially different climate outcomes between co-digestion and composting. The Draft applies rigorous lifecycle analysis to biosolids management while treating composting and long-distance waste export largely descriptively, without comparable evaluation of downstream emissions, sequestration potential, or avoided impacts. We urge the Department of Sanitation to provide substantive, written responses that: Apply comparable lifecycle and system-boundary analysis across disposal, composting and co-digestion pathways ... (Environmental Coalition)

Response 127. DSNY reports on the end sites for all diverted and recovered organics as part of SWMP biennial reporting available here: <https://www.nyc.gov/site/dsny/resources/reports/solid-waste-management-plan.page>. The split between composting and anaerobic digestion (AD) fluctuates seasonally and over time. The average for Calendar Year 2025 was almost evenly split between compost and AD. DSNY and DEC consider both composting and anaerobic digestion beneficial uses for organic material. The Environmental Assessment Statement for *SWMP26* includes a discussion of emissions associated with different types of solid waste management, including lifecycle considerations.

Comment 128. While we commend DSNY's goal to reduce overall sludge volume, the *SWMP26* fails to recognize the serious harm sewage sludge has on the environment and public health. Instead, the *SWMP26* wrongly identifies sludge as a "beneficial use," and seeks to "diversify end use" of sludge using methods that will advance and expand the harms of sludge ... *SWMP26* aggressively advances co-digestion ... This approach is a scientifically and operationally unsound tactic to managing waste. Co-digestion entangles a recoverable—and valuable—waste stream (food scraps suitable for composting) with an intrinsically contaminated—and toxic—waste stream (sewage sludge). We recommend that DSNY revise the plan to ban co-digestion and divert food scraps to composting ... [Composting] produces a stable soil amendment, improves soil health, and reduces greenhouse gas emissions without introducing toxic contaminants ... Increasing co-digestion capacity will create problems for the city and public health down the road ... composting food scraps offers a sound and beneficial solution to managing food waste. (CSFL)

Response 128. The goal to reduce sludge volume is DEP's. The City considers codigestion a beneficial use of source-separated organics and neither supports a ban on the practice nor a ban on the beneficial use of biosolids. The City follows state and federal requirements and guidance on all solid waste management practices. Most of the biosolids generated at the City's WWRFs are the unavoidable product of wastewater treatment. For the same amount of food waste, fugitive methane emissions from wastewater treatment where emissions are contained in digesters are lower than methane

emissions from landfills that require gas capture over a large area. Enabling codigestion at WRRFs maximizes the use of existing necessary industrial sites without the need for major upgrades.

Comment 129. Summary: SWMP26 should prioritize compositing of material collected through DSNY's Citywide Residential Organics Program and commercial organics program over expansion of anaerobic digestion capacity. A distributed network of compost facilities, including those at the community scale, should be developed.

Response 129. The City does not prioritize one organics processing method over another but rather supports a diverse and resilient system that can adapt and grow with the program over time. DSNY supports the advancement of all types of organics recovery infrastructure to meet the projected growth in collected tonnage citywide. As outlined in the SWMP, there is currently sufficient capacity to process all organics collected, and DSNY will monitor this closely through implementation.

Biogas distributed through the gas-to-grid system displaces fossil fuel use with energy that is a byproduct of wastewater treatment and would be produced regardless of codigestion. As discussed in SWMP26, the energy generated by the biogas-to-grid system at Newtown Creek each year is enough to provide for the annual heating needs of nearly 6,000 homes. The distribution of this energy relies on existing infrastructure while reducing the use of fossil fuels.

NYCHA's existing on-site composting programs include eight farms across the five boroughs with on-site, three-bin compost systems that have been in operation for several years. The food scraps and yard waste collected are processed locally at these sites by Compost Power and Green City Force, and finished compost is provided to NYCHA residents for NYCHA grounds, community gardens, and urban farms. Additionally, in 2022, NYCHA expanded on-site organics collection and processing to non-farm sites at Polo Grounds Towers and Patterson Houses by adding three-bin compost systems built and operated by Compost Power. The expanded sites have started to collect residential food scraps from nearby developments and offer an example of an expanded network of residential food waste diversion options.

As part of **Strategy 34** (initiate the organics processing capacity stakeholder process inclusive of various scales of processing and transportation modes), DSNY, NYCPS, and NYCHA will consider ways to increase organics recovery and composting at schools and on NYCHA grounds.

Yard waste sorting and collection is already implemented NYCHA-wide, providing a substantial amount of organics diversion. NYCHA has a phased approach to increasing diversion with a focus on food scraps that includes leveraging existing solutions (Smart Bins, public drop-off sites), partnerships with local groups including Compost Power and Gotham Food Pantry, and pilot programs like food waste drop-off at community centers.

Detailed Comments

All compostable material should be turned into compost, not biosolids. (Pace University)

The DSNY must prioritize composting of food scraps that cannot be used for people or animals. (ICC)

Municipal composting sites are necessary to process increasing amounts of food and yard waste separated by both residents and businesses as landmark curbside composting and commercial waste zones programs are fully implemented. These facilities could efficiently recycle millions of

tons of organic waste per day, reducing the need for expensive and environmentally harmful waste export, reducing distances traveled by compost collection trucks, and creating good local jobs in our communities. Environmentally, composting facilities are far preferable to anaerobic co-digestion facilities where food waste is added to sewage sludge to produce biogas. National Grid's co-digestion pilot at Newtown Creek has resulted in excessive methane gas flaring⁴⁰ and perpetuates the use of harmful fossil gas infrastructure and gas combustion systems in buildings. (NYC EJA)

Composting reduces methane emissions, produces a clean soil amendment, creates local jobs, and strengthens community-scale resilience. By contrast, co-digestion of food waste with biosolids produces a contaminated digestate that contains PFAS and other toxic substances and is often land-applied, posing long-term risks to soil, water, and food systems. The Plan acknowledges the need for expanded composting capacity, yet stops short of committing to composting as the leading organics management strategy. New York City has the opportunity to invest in decentralized, borough-based composting infrastructure that aligns with climate goals, supports local economies, and avoids concentrating harm in already overburdened communities. Environmental Advocates NY urges the City to clearly prioritize composting over bio-digestion and co-digestion and to ensure that clean organic material is diverted away from wastewater treatment facilities and toward composting operations that protect public health and environmental quality. (EANY)

It is disheartening that the residential Brown Bin program and Orange Smart bins are promoted as "Composting," when most of Manhattan's material is going to the Anaerobic Digester in Newtown Creek to be co-digested with wastewater. While there may be a place for biogas in our waste ecosystem ... IF it is being put to beneficial energy use and not flared ... the bigger benefit of TRUE composting is undeniable. From community engagement and education, to creating nutrient-rich soil amendment supporting city parks, trees and gardens, to green jobs, the move should be TOWARDS actual composting, not away. DSNY, will you help us improve composting? I strongly advocate for the creation of more small, medium and large-scale composting facilities and drop-off sites in each borough. To really succeed, we need an army of educators and promoters to work with buildings. I suggest that you use the already robust NYC compost network. Deputize them. Partner with them ... They can teach, engage others, inspire, move the needle. Little to no budget is needed for this. (E. Cooper)

The 2026 NYC SWMP should recommend more "clean" compostable organic materials are diverted from Newtown Creek and other biodigestors, and are sent to Staten Island or one of the 6 other composting facilities in NYC. (EANY)

The codigestion of source-separated food scraps with sewage sludge also eliminates the value of food scraps as a clean, beneficial soil amendment. When food scraps are kept separate from sewage sludge, they can be transformed into a valuable product that supports climate mitigation, sustainable agriculture, and community resilience. The Draft Plan explicitly acknowledges the value of composting by including important goals such as increasing the quality and quantity of diverted organics, increasing composting, and supporting community composting programs.⁴¹ Expanding codigestion of sewage sludge with food waste inherently undermines these important goals. (Just Zero)

We strongly urge DSNY to reconsider its treatment of anaerobic digestion (AD) in the *Draft 2026 SWMP*. While AD is often presented as a "sustainable" strategy for managing organic waste, the

plan does not fully address the technology's environmental, health, or equity implications, particularly in overburdened communities. AD facilities pose siting and emissions risks, frequently located in industrial areas adjacent to environmental justice communities where they introduce odor issues, truck congestion, noise, and risks of methane leaks. (TDT)

An expansion of codigestion is at odds with NYC's own goals such as its curbside composting program and initiative 2.1 of *SWMP26* to "Increase the quality and quantity of organics diverted citywide." Recommendation: To protect public health from the toxicity of sewage sludge codigestion should be banned and the following strategies should be included under our proposed initiative: "Phase out codigestion of biosolids/sewage sludge with food scraps." This includes ending the existing practice of codigesting food scraps with sewage sludge at the Newtown Creek Wastewater Treatment Facility; "Halt any expansion of codigestion." This includes the proposed codigestion project at the Hunts Point Wastewater Treatment facility and the possibility of a project on Rikers Island. (*SWMP26* p. 41; Table 1-5, 135, 137). (CSFL)

Systems dependent on constant organics throughput discourage upstream waste reduction and can create long-term lock-in to combustion-based energy systems. AD is thus incompatible with true zero-waste goals. (TDT)

A significant portion of the organics that are currently being separately placed out for collection by city residents are being sent to the city's Newtown Creek Wastewater Treatment Plant to be codigested with sewage sludge. While this process may be preferable to landfilling or incineration because some methane is captured and reused, it is far from ideal. There are fugitive methane leaks from this process, the remaining slurry (called "digestate") contains PFAS and other harmful substances and cannot be safely used as an agricultural soil enhancement, and the whole process requires the support of fossil-fuel pipes and infrastructure at a time when city and state laws rightly require moving away from oil and gas. The *Draft SWMP* gets it half right on the composting issue—the document favorably mentions increasing the quality and quantity of organics diverted, boosting the recovery rate of DSNY-managed organics, increasing composting and wood reuse, and promoting food donation and rescue. However, in a major step in the wrong direction, the Draft also embraces the goal of expanding co-digestion of organics and sewage sludge at wastewater treatment plants and somehow beneficially reusing the contaminated digestate "biosolids" left over from the co-digestion process. (*Draft SWMP* at [page] 132.) (NRDC)

The document's current embrace of co-digestion at sewage plants and failure to include comprehensive, Marshall Plan-level commitments to expansion of composting is perhaps the *Draft SWMP*'s single greatest shortcoming. (NRDC)

When I read mentions of community composting I saw words like "continue to support" - not "increase or expand" which were used when discussing digesters. On page 175, the plan indicates that DSNY will develop plans to expand organics codigestion capacity and biogas recovery, with the potential for biogas infrastructure on City property. Will there be a similar plan developed for expanding actual on site composting using various methods? Is DSNY reviewing and considering increasing composting infrastructure as the better option? If codigestion is DSNY's preferred option, how was that determined? (Allen)

The plan seemingly supports co-digestion over actual composting even though DSNY places orange "compost" bins throughout the city which is misleading and inaccurate. What is the rationale for the apparent stronger support and enthusiasm for codigestion and digesters? (Allen)

We strongly support the City's commitment to expanding organics diversion. However, we urge DSNY and the City to prioritize funding and expansion of local community composting, rather than relying heavily on codigestion and other centralized processing approaches ... Codigestion may play a role in managing biosolids, but it does not deliver the same climate benefits, environmental justice, education, or community benefits as local composting. Community composting reduces truck traffic, builds public participation, produces compost that is actually used in the city, and creates opportunities for local stewardship—especially in schools and NYCHA communities ... Our recommendation is clear: Treat codigestion as supplemental, not central, to the City's organics strategy. (CafCu)

Environmentally, composting facilities are far preferable to anaerobic co-digestion facilities where food waste is added to sewage sludge to produce biogas. National Grid's co-digestion pilot at Newtown Creek has resulted in excessive methane gas flaring and perpetuates the use of harmful fossil gas infrastructure and gas combustion systems in buildings. (NYC EJA)

I would like to focus on prioritizing turning organic residuals into compost, not biosolids ... mixing essentially "clean" food waste with the material that enters wastewater treatment plants will "contaminate" the food waste, rendering it potentially unsafe to apply to land. The benefits of generating methane from the food waste pales in comparison to the benefits of turning the food waste into high quality compost that can be used to support urban green infrastructure, urban agriculture, and climate adaptation. I do not support sending any compostable food scraps to anaerobic codigestion. I do not support the creation of another anaerobic co-digestion facility in Hunts Point. Food waste is needed to make a high-quality compost (Pace University)

Without rigorous oversight, AD [anaerobic digestion] projects can displace community-scale composting and replicate the very burdens the SWMP was designed to correct ... DSNY should not consider the expansion of a codigestion facility on Rikers Island ... DSNY should place strict limits on future AD development, prevent siting in or near environmental justice communities, invest in aerobic composting and community-scale systems, and commit to a precautionary, climate-conscious approach to organics management. (TDT)

The anaerobic biogas production as a part of the codigestion process described in the Draft Plan poses additional risks. Methane, the primary gas generated in the anaerobic digestion process, is a powerful climate-damaging gas, and digesters are unable to capture all the methane generated without significant leaks. In fact, a 2023 study showed that the EPA underestimates methane emissions from wastewater treatment plants by a factor of two.⁴² (Just Zero)

The questions of how to limit persistent organic pollutants to water resource recovery facilities is one that will continue to require research and regulation. The questions of how and where to safely dispose of biosolids is a major concern that also deserves more research and long-term monitoring. Increasing the volume of biosolids created by including food scraps that can be composted contributes to the burden and costs of having to dispose of this material safely. From a safety and health perspective, food scraps should be composted, not turned into biosolids, so that they can be safely used as soil amendments. (Pace University)

Anaerobic digestion and the safe disposition of treated, dewatered sewage solids are essential public-health functions in New York City, and they are managed superbly by the highly professional staff of DEP's Bureau of Wastewater Treatment ... Anaerobic digestion, as a wastewater treatment technology, should not be vilified for its use in support of the City's core and non-negotiable

responsibility ... it is increasingly clear that wastewater treatment plants accumulate synthetic compounds—such as PFAS and other persistent chemicals—that are not created by treatment processes but concentrate within them ... These concerns exist independently of the necessity of wastewater treatment itself ... New York City residents carefully separate and set out [food scraps] in the name of composting ... Public objection to routing food scraps into NYC's wastewater AD systems has been persistent, particularly among the community of composters and among residents who understand where their separated organics are ultimately sent. (MacBride)

Passing the mandatory citywide composting law in 2023 was an important step towards achieving the city's goal of zero (divertible) waste to landfill and incinerators by 2030. However, only 20% is actually composted. Eighty percent is trucked to the Newtown Creek codigestion plant, where it is anaerobically digested into biogas (methane) and biosolids that are contaminated by microplastics, PFAS, and other toxic substances rendering it unsuitable as a fertilizer. While anaerobic digestion does divert food scraps from landfill, we oppose the DSNY's plan to expand this program ... Compost not only sequesters carbon but can be used to nourish the depleted soil of local parks, community gardens, street trees, and urban farms. And, as the city faces rising sea levels and more frequent torrential downpours, compost can play a vital role in flood mitigation because it acts as a sponge, retaining up to six times its weight in water. (350NYC)

DSNY has branded all the brown bins, all the smart bins, as composting bins. We need to be very careful about that, because we need to understand what composting is. Composting doesn't mean separating your food waste. Composting means creating a soil amendment, which is what we do here at Queens Botanical Garden, which is what Earth Matter is doing, which is what so many organizations are doing at a smaller scale; that is composting ... Currently, we sort our waste into the brown bin, or the smart bins. They go to (Newtown Creek) ... an anaerobic digester. DSNY will say, "Well, that's better than landfill and incinerator." ... it's not as good as composting. Composting is the gold standard ... We should not be putting our food scraps in a bin that's going to be taken to Newtown Creek where it's actually transported to Ohio, that's where the landfill for the slurry is. [This is] highly inefficient, and we're still creating a lot of methane through that. The advantage of composting, really, like, if anyone wants to see the advantage of composting—come out to Queens Botanical Garden and take one of our Master Composer workshops— is to reduce methane emissions, because ... methane emissions are ... considerably worse than carbon dioxide ... (QBG)

It's incredibly difficult to actually get the word out about community composting. There's this very big divide as to what community composting is vs what the brown bins are. I want to be very clear and say that I am in full support of having a municipal system, but I want to make sure that it's a robust system. I want to make sure that we're actually composting that we are not doing something that is not composting. (QBG)

Comment 130. To make space for managing sewage sludge in landfills—which are rapidly losing capacity—it is vital to remove materials that should not be in landfills. For instance, composting food scraps instead of codigesting them with sewage sludge will save landfills capacity. Codigestion of food scraps is just a roundabout way of food waste ending up in landfills. (CSFL)

Response 130. Biogas produced with anaerobic digestion is easier to recover for beneficial use than methane produced at landfills. During anaerobic digestion, the amount of solid or semi-solid material remaining is much lower than the amount of food waste input due to the moisture content of food waste and the conversion to biogas. Therefore, anaerobic digestion reduces the amount of waste

managed at landfills, even considering the residual amount of biosolids produced from food waste that may be disposed at landfills.

Comment 131. Complete the comprehensive organics study started by Arcadis. Evaluate the different options for organics processing with a long-term lens, to determine if increasing co-digestion is a good idea, or whether stand-alone AD, pretreatment and transport to out of city compost sites is the best option, along with vastly ramping up composting in city green spaces. (CZWD)

Response 131. See **Strategy 34**, initiate the organics processing capacity stakeholder process inclusive of various scales of processing and transportation modes. *PlaNYC: Getting Sustainability Done, 2025 Progress Report* provided an update on the organics study.⁴³

Biosolids and Codigestion

Comment 132. Summary: Codigestion facilities should be expanded to support the city's circular economy and reduce emissions from composting.

Response 132. Noted. DSNY agrees that both composting and anaerobic digestion (AD) have certain benefits, sharing greenhouse gas (GHG) reduction potential and differential potential as it relates to odor generation and tolerance of feedstock variability. DSNY will continue to evaluate all types of organics processing facilities during implementation.

Detailed Comments

Upgrade the City's wastewater treatment plants' digesters to process organic waste into renewable energy to reduce local pollution and help address food waste, including exploring the feasibility of public-private partnerships. (NYLCV)

[To build a cleaner, smarter, and more resilient New York City the final *SWMP26* should] ... build high-impact circular economies firmly anchored here in New York City ... Commit to Circular Offtake Pathways Within City Systems: When NYC's waste can be upgraded to on-site inputs, fuels, or feedstocks, the City should adopt performance-based offtakes and streamline procurement to catalyze high-impact NYC-anchored waste-to-value (e.g., biosolids-to-biofuel) circular economies. This means the city's own waste can drive its decarbonization journey. (Decarb Energy Partners)

SWMP26 plan places a heavy emphasis on increasing composting as the primary recovery method for source-separated organics, yet does not intend to recover materials or energy from other fractions of the MSW stream. However, composting requires high-quality source separation to prevent the accumulation of both physical contaminants and chemical contaminants ...⁴⁴ The draft plan states that due to contamination collected organics still go to landfill or a third-party, which likely sends it to landfill. As the system currently stands, source separation quality remains inconsistent, with non-compostable material detected in 57% of source separated food waste.⁴⁵ Additionally, composting results in the emission of GHGs and other pollutants directly to the atmosphere, with no opportunity for energy recovery. Anaerobic digestion (AD) of both biosolids and source-separated organics offers a more effective strategy for maximizing net energy production while minimizing GHG emissions and odor. Although composting degrades up to twice as much total carbon, AD converts more than 50% of degraded carbon into methane, a usable

energy carrier. Finally, because AD operates in closed systems, odor emissions to nearby areas are significantly reduced. AD can also tolerate more variable feedstock, as it can process harder-to-digest organic waste, making it a more flexible system in the long term. Overall, it is worth considering more concrete planning towards AD efforts alongside plans currently outlined. (CCNY EEC)

We support DSNY's goal of evaluating opportunities for co-location of new and innovative wastewater and/or organics waste management infrastructure at city-owned properties, including locations that have been previously evaluated, such as Rikers Island [and] expanding codigestion and beneficial use of biosolids and biogas. (NYLCV)

Decarb Energy Partners appreciates DSNY's comprehensive *Draft SWMP26* and strongly supports the Plan's direction to expand codigestion, in-city beneficial use of biosolids/biogas, and WRRF co-location. (Decarb Energy Partners)

Comment 133. Summary: The City should end the land application of sewage sludge.

Response 133. The City supports non-landfill uses for biosolids given the methane generation potential of the material when landfilled, concerns about landfill impacts on host communities and over time, and the nutrient value contained in the material. DEP acknowledges the importance of compliance with land application regulations for biosolids and other wastewater-derived residuals to protect human health and the environment.

Detailed Comments

ICC amplifies the recommendation from Just Zero and the Coalition for Sludge Free Land (CSFL) that there must be an end to the land application of sewage sludge. (ICC)

[I'm writing as an Environmental Advocates NY supporter to urge you to include the following agency strategies in the *Draft 2026 NYC Solid Waste Management Plan* (SWMP):] DSNY will divert biosolids (sewage sludge) from land application programs and explore infrastructure and technology that can limit the leachate and emissions of sludge in landfills. (Scovell) (Bargholz) (EANY)

Just Zero urges DSNY to remove the codigestion program and strategies from the Draft Plan and replace it with a commitment to avoid codigestion of organic waste with sewage at all New York City WRRFs and a prohibition on the land application of any sewage sludge from New York City's WRRFs. We also urge you to implement the more in-depth recommendations presented in comments submitted by the Coalition for Sludge Free Land, of which Just Zero is a founding member and signatory. (Just Zero)

This "diversifying" includes direct land application and composting (which will presumably then be land applied)⁴⁶ ... This ignores the significant social costs of land application and leaves NYC unprepared for imminent regulatory change, exposing the City to avoidable environmental, financial, and legal consequences ... DSNY must reverse its position in the *SWMP26* that land applying sewage sludge is an acceptable and "beneficial" end-use because the land application of sewage sludge and sludge derived materials results in irreversible harm ... A strategy under our recommended initiative should be to "Ban the land application of sewage sludge or material mixed with sewage sludge (including compost)." (CSFL)

Unfortunately, the *SWMP26* does not recognize the harms of sewage sludge. In fact, its proposed strategies to manage sewage sludge will expose more people and ecosystems to sludge harms. We recommend DSNY revise the plan to acknowledge the dangers of sewage sludge and eliminate any reference to the “beneficial use” of sludge. (CSFL)

We strongly support diverting materials from landfills that can be responsibly and safely reused, recycled, or otherwise managed. These initiatives are critical for preserving landfill capacity for materials that must be isolated from the environment and managed closely, like sewage sludge ... materials mixed with sewage sludge should be landfilled. Strategies under our recommended initiative should include: “Landfill all sewage sludge and sludge-derived material.” (CSFL)

The *SWMP26* wrongly has a primary strategy to divert all sewage sludge (biosolids) from landfills by 2030 by diversifying end-use sites and vendors⁴⁷ ... “Reduce overall sludge volume through a combination of methods including enhanced biological phosphorus removal (EBPR), optimized solids retention times, improved thickening and dewatering, anaerobic digestion, and thermal drying.” ... “Explore innovative methods to reduce overall sludge volume.” ... To effectuate volume reduction, the plan should ban the codigestion of food waste with sewage sludge. (CSFL)

SWMP26 considers various methods to address sewage sludge but seeks to eliminate the only safe way of managing sewage sludge—landfilling. Land application, co-digestion of food waste with sludge, composting with sludge, and burning sludge (incineration, gasification, pyrolysis) all function to spread contamination, not manage it. Instead, sewage sludge must be addressed through volume reduction, and containment, rather than dispersal into the environment. We recommend that DSNY revise the plan to concentrate on sewage sludge volume reduction. The sludge that cannot be reduced should be landfilled ... landfilling is the only disposal pathway for sewage sludge that minimizes immediate exposure risks from the contaminants found in sludge such as PFAS and microplastics. Landfills are not a perfect solution, and no one claims they are. However, well-engineered landfills are designed to isolate hazardous or otherwise dangerous materials, control releases, and allow for monitoring and treatment of contaminated leachate. In contrast to land application and reuse schemes, landfilling acknowledges sludge’s toxicity and seeks to contain it ... landfilling should not be treated as an endpoint but as a containment strategy that should be paired with aggressive volume reduction of sludge, on-site treatment of landfill leachate, and upstream source control of pollutants that enter the waste stream. Reducing sewage sludge volume through in-plant process optimization—rather than expanding downstream disposal or reuse pathways—is more effective, more predictable, and far safer than attempting to manage ever-growing quantities of contaminated sludge and sludge derived materials. (CSFL)

The first order of change must be land application. The negative impact on public health from land application is measurable. The exposure to viable pathogens, antibiotic resistant pathogens, as well as toxic chemicals classified as carcinogens, neurotoxins, endocrine disruptors, mutagens and teratogens, from land application, is also measurable. Because I personally lived in a community for many years where land application occurred, and my family suffered greatly, we were inspired to research and study deeply. These are just some of the health outcomes of that community impacted by chronic exposure to sewage sludge: 54% greater risk of breast cancer; 726% greater risk of bone cancer; 221% greater risk of myeloid leukemia; 306% greater risk of congenital anomalies of the limbs; 234% greater risk of dementias; 74% greater risk of viral infections; 413% greater risk of schizophrenic disorders. Plus, 120+ more diagnoses, like lung and heart disease, mental health disorders, reproductive disorders, GI disorders, infections, and many, many more.

Would you want your city's sewage next to your home, or your child's playground at school? I can promise you, you would not. If that is the case, you must take all action necessary to stop land-applying sewage sludge anywhere. (Mission503)

Please watch our recently released video, "Open Letter to POTUS, Sec'y Kennedy and the American People," linked below, demonstrating the harm to communities. Land-applying sewage is spreading sickness, disease and suffering among American families.

<https://youtu.be/AnbilmHxyGE?si=CAkH0KC03ZapUQyX> (Yokel)

Comment 134. The *SWMP26* incorrectly and repeatedly treats sewage sludge ("biosolids") as a benign material, categorizing it as an "organics" waste stream and grouping it with materials like food scraps and yard waste.⁴⁸ The *SWMP26* creates confusion by implying a difference between sewage sludge and biosolids through its glossary and more frequent use of "sludge" in connection to "waste" and use of "biosolids" in connection with "organics" despite the materials being chemically similar.⁴⁹ The plan erroneously frames sewage sludge as a material suitable for "diversion," "recovery," and "beneficial use."⁵⁰ ... Recommendation 1: To dispel any confusion that "biosolids" is the same as sewage sludge, we recommend the following edits to the glossary: Biosolids: an organic byproduct of wastewater (sewage) treatment and dewatering. Also may be referred to as "sewage sludge" or "sludge" (p. 229); Sludge: settleable solids separated from wastewater during processing. Also may be referred to as "biosolids" (p. 231). (CSFL)

Response 134. The grouping of organic materials in *SWMP26* is based on the high carbon content of these materials. In the document, the term *biosolids* is used to describe the final product, while the term *sludge* refers to the material prior to digestion. When discussing the amount of organics requiring management, the term *biosolids* is used because the tonnages presented represent the quantities produced after anaerobic digestion.

Comment 135. While codigestion can yield measurable decarbonization benefits, those benefits are incremental. Comparable greenhouse-gas reductions are realized through the anaerobic digestion of sewage solids alone. If NYC DEP were to implement biogas recovery at all of its plants with anaerobic digestion, the benefits would far outweigh supplementary additions of food scraps for codigestion. The plan's reliance on expanded co-digestion capacity ... reflects an operational logic rooted in large-scale flows and guaranteed acceptance capacity ... however, it is divorced from a real goal of sustainability. Organics programs ... are also about soil health, connections to sustainable and localized agriculture, and the community benefits that have been built—often at great effort—by community-based organizations in New York City over decades ... Claims that codigestion is on par with composting as a truly sustainable activity need to be rethought at a fundamental level by the Department of Sanitation and by the City administration. (MacBride)

Response 135. The City will diversify the beneficial uses of SSO to achieve both GHG reductions as well as soil enhancement by using a variety of processing technologies.

Comment 136. Wastewater-based anaerobic digestion ... can be an appropriate outlet for [organics] that are so compromised that safe composting is not viable. In fact, much of the organics material currently delivered to contracted transfer stations undergoes mechanical decontamination, generating substantial residuals of plastic film and other contaminants. Even where partial separation is

achieved, the resulting output is of poor quality. Codigestion may also serve as a pressure-release valve where composting capacity is temporarily constrained. However, these uses should not impede—nor be allowed to crowd out—the development of local aerobic composting capacity within New York City. (MacBride)

Response 136. Noted.

Comment 137. *SWMP26* appropriately recognizes the need to “reduce overall sludge volume.”⁵¹ This objective is sound and should be elevated as the plan’s primary organizing principle of sewage sludge management. Reducing the quantity of sludge generated is one of the most effective strategies for limiting sludge’s risk and controlling costs. (CSFL)

Response 137. Noted. **Initiative 2.4** includes **Strategy 38**, reduce overall sludge volume while improving liquid sludge quality through enhanced thickening and digestion processes; in parallel, assess the feasibility of on-site drying technologies to further reduce dewatered solids, enabling more cost-effective and sustainable downstream handling.

Comment 138. Eliminate initiative 2.4 “Expand co-digestion and beneficial use of biosolids and biogas” ... (Table ES-2, p. 9; p. 132, 137-138, 175-76, 179; Table 6-2, p. 184-85; p. 210); Remove the “Co-digestion capacity percent increase” proposed performance metrics ... Because thermal treatment of sewage sludge is toxic and harmful to public health, DSNY should remove initiative 2.4 its corresponding agency strategies, strategy milestones, and agency initiatives—especially the strategy to advance thermal conversion of sewage sludge via pyrolysis or gasification as outlined in DEP Energy and Carbon Neutrality Plan, Task 3: Biosolids Master Plan. (Table ES-2, p. 9; p. 132, 137-138, 175-76, 179; Table 6-2, p. 184-85; p. 210) (p. 186) ... Because landfilling is currently the safest disposal pathway for sewage sludge, remove initiative 2.4 and its corresponding agency strategies—particularly the strategy to “Pursue the goal of 100% diversion of biosolids from landfills by 2030 by diversifying end-use sites and vendors” (Table ES-2, p. 9; p. 132, 137-138, 175-76, 179; Table 6-2, p. 184-85; p. 210) and any other references to this (p. 186, 222). (CSFL)

Response 138. See previous responses.

Comment 139. No technology is currently available to remove PFAS from sewage sludge in a safe, cost-effective manner. PFAS are highly persistent chemicals (there are approximately 15,000 different PFAS compounds) that are extremely difficult to destroy. Attempts to destroy PFAS with thermal technologies can create products of incomplete destruction (PIDs), which are themselves toxic.⁵² ... the safest way to dispose of sewage sludge is landfilling. (CAAN)

The *Draft SWMP26* includes several references to thermal conversion or thermal treatment technologies as a method for managing sewage sludge.⁵³ Specifically, the plan focuses on using pyrolysis or gasification to produce syngas, bio-oil, and biochar.⁵⁴ These approaches are framed as innovative or climate-forward solutions. In reality, this framing is unsupported by the scientific record and contradicted by regulatory experience in New York State. We recommend that DSNY revise the plan to exclude thermal treatment as a method to manage sewage sludge waste ... New York State regulators recently denied a sewage sludge pyrolysis project for failing to demonstrate safe contaminant destruction, containment, and emissions control ... [and] public health concerns

... This recent rejection of pyrolysis demonstrates that these technologies are unsafe, understudied, and not a viable management option for sewage sludge. (CSFL)

Response 139. DSNY will include information gathered from **Strategy 78** regarding the monitoring of thermal treatment technologies as it relates to biosolids and other organic residuals in biennial reports.

Comment 140. We support pursuing the goal of 100% diversion of biosolids from landfills by 2030 by diversifying end-use sites and vendors. (NYLCV)

We applaud DSNY's target to divert all biosolids from landfills by 2030 and to grow beneficial use. (Decarb Energy Partners)

Response 140. Noted.

Codigestion and PFAS

Comment 141. Summary: Biosolids contain PFAS and other chemicals that are not safe for humans and the environment. Land application of biosolids is risky and should not be allowed.

Response 141. DEP acknowledges the importance of compliance with land application regulations for biosolids and other wastewater derived residuals to protect human health and the environment.

Detailed Comments

Industrial wastewater and human waste both flow into our sewage system, meaning resulting solids are contaminated with “forever” PFAS chemicals,⁵⁵ heavy metals, industrial solvents, microplastics, pesticides,⁵⁶ pharmaceutical drugs,⁵⁷ and more. PFAS chemicals are linked to⁵⁸ developmental delays, decreased fertility, increased cancer rates, interference with hormonal health, and reduced immune system capacity. They cause testicular cancer, kidney cancer,⁵⁹ and ulcerative colitis.⁶⁰ These chemicals build up⁶¹ in living organisms. When livestock is fed feed contaminated with PFAS, these chemicals build up in their bodies, contaminating meat, eggs, and dairy⁶² ... While landfilling biosolids includes challenges, there is infrastructure (covers, liners, capture systems) possible to mitigate the impact of PFAS and other chemicals on the environment. This is in contrast to the direct contamination of our land and food. It is irresponsible to ignore the threats that biosolid land application poses to our food, our farmland, and our public health ... Anaerobic codigestion of biosolids and food scraps in facilities like Newtown Creek create a contaminated digestate product that is then used as a fertilizer⁶³ on farms and gardens. This digestate product, like biosolids generally, is contaminated with PFAS “forever” chemicals and other contaminants. It is not a safe soil amendment for growing crops or applying to land, and NYC's contaminated digester waste should not be land applied. (EANY)

[Biosolids] should never be utilized as a compost, fertilizer, or soil amendment as described in the Draft Plan—it is too dangerous. And yet, the Draft Plan erroneously and repeatedly treats sewage sludge as a “safe” form of organic waste suitable for “diversion,” recovery,” and “beneficial use,” and endorses the land application of sewage sludge.⁶⁴ Land applying sewage sludge, or organic waste codigested with sewage sludge, results in PFAS contamination of soil, waterways, and even food.⁶⁵ It is also one of the most significant pathways through which microplastics enter our agricultural soil.⁶⁶ (Just Zero)

We raise concerns about the *Draft SWMP26*'s reliance on the land application of compost. Specifically, the *Draft SWMP26* fails to consider the challenges associated with managing PFAS-contaminated waste. PFAS (per- and polyfluoroalkyl substances), a group of man-made chemicals present in consumer goods and food packaging, are known to bioaccumulate in humans, animals, and the environment, giving rise to cancer, liver damage, weakened immune systems, and other serious health problems.⁶⁷ For this reason, regulatory agencies are working to detect, understand, and regulate the handling of PFAS-containing waste streams.⁶⁸ This may soon render land application of certain kinds of compost illegal, and without contingency planning, result in increased reliance on landfilling. This risk reinforces the need for diversified recovery pathways. (CCNY EEC)

To protect public and ecosystem health, under the Organics Diversion and Recovery Program, DSNY should create a new initiative—"Advance volume reduction and limit public exposure to sewage sludge." Under this initiative's explanatory section, DSNY should explain the toxicity of sewage sludge and highlight the harmful contaminants found in sludge such as PFAS and their health impacts. Each strategy under this initiative should have the purpose of limiting the public from exposure to sewage sludge. (CSFL)

Recent science shows that plants uptake PFAS, including into some edible crops ... yet DSNY's draft says that in the next ten years almost all of NYC's sewage sludge will be spread on land. (CURES)

The presence of multiple co-occurring contaminants in sewage sludge means that land application results in aggregate and cumulative risks that cannot be adequately evaluated or managed on a single-chemical basis ... Contamination from land-applied sewage sludge is not limited to soils and food systems. A 2022 study documented the migration of PFAS from sludge-amended soils to underlying groundwater at depths of up to 17 meters, with impacts persisting long after land application ceased.⁶⁹ (CSFL)

A driving goal in the *SWMP26* is to "expand" the "beneficial use of biosolids and biogas."⁷⁰ The plan explains that "beneficial use" is essentially an administrative designation for waste material that is used in place of raw or manufactured material after a state determination that it is safe to human health and the environment without any determination of PFAS contamination⁷¹ ... Because biosolids are unsafe, the *SWMP26* must remove all references to exploring or expanding end-use applications and sites for biosolids. (p. 9, 138, 175, 184, 186) (CSFL)

Part of the NY Sanitation Department's plan to handle trash would turn sewage and food scraps into methane, carbon dioxide, and biosolids. The biosolids would be applied to farmlands, which would poison our food supply since biosolids contain PFAS, microplastics and heavy metals. (Kronheim)

Wastewater treatment concentrates pollutants in sludge, including per- and polyfluoroalkyl substances ("PFAS"), microplastics, pharmaceuticals, flame retardants, pathogens, heavy metals, and hundreds of other endocrine-disrupting, cancer-causing, and otherwise dangerous compounds. Wastewater treatment plants are not designed or equipped to remove or destroy these compounds. Reports from the United States Environmental Protection Agency ("EPA") confirms the widespread presence of toxic chemicals in sewage sludge nationwide while acknowledging that most emerging contaminants are not regulated.⁷² ... PFAS have a strong tendency to bind to sewage sludge.⁷³ Additionally, PFAS contamination of sludge is not limited to industrial hotspots but is present in all municipal sewage sludge.⁷⁴ Not only is PFAS contamination pervasive in

sewage sludge but it concentrates at extremely high levels⁷⁵ ... New York, where millions of gallons of PFAS-contaminated landfill leachate are sent to wastewater treatment plants⁷⁶ ... many other contaminants that have adverse health impacts are routinely found in sewage sludge ... the risks associated with sludge are intrinsic to the material itself and cannot be mitigated through treatment. (CSFL)

We ... recommend that the co-digestion of food scraps with sewage sludge be eliminated as a component of the city's LSWMP. Mixing food scraps with sewage sludge increases the volume of contaminated materials that the City has to dispose of ... We oppose contaminating gardens, farmland, parks, and other areas with PFAS-contaminated soil amendments. Getting rid of sewage sludge-derived digestate as a soil amendment is unethical, as it will poison the land and expose gardeners or farm workers, consumers, and the environment to persistent toxic chemicals. (CAAN)

DSNY's plans to expand the codigestion of organic waste with sewage sludge at wastewater resource recovery facilities ("WRRFs"),⁷⁷ however, poses significant threats to the environment and public health and will undermine vital efforts to divert food waste from landfills and incinerators ... put an end to the dangerous practice of codigesting organic waste with sewage sludge in New York City. Sewage sludge contains thousands of harmful chemicals, including per- and polyfluoroalkyl substances ("PFAS"), dioxins, furans, and PCBs.⁷⁸ PFAS, which are associated with development delays, fertility and pregnancy problems, hormone disruptions, immune dysfunction, and certain cancers,⁷⁹ are pervasive in all municipal sewage sludge.⁸⁰ By mixing and codigesting organic waste and sewage sludge, New York City is increasing the mass of this toxic waste product. (Just Zero)

Consider the issues with PFAS, plastics and other contaminants in reuse of residual sludge from co-digested AD, and possible future legal restrictions for any beneficial use. We believe that it should not be expanded. (CZWD)

Recommendation: Because biosolids cannot be of beneficial use due to their toxicity, remove initiative 2.4 "Expand codigestion and beneficial use of biosolids and biogas" and its corresponding agency strategies and strategy milestones. (Table ES-2, p. 9; p. 132, 137-138, 179; Table 6-2, p. 184-85; p. 210) (CSFL)

Attachment D acknowledges the contaminants found in sewage sludge, provides a history of tightening regulation on the material as a response to its toxicity, and is aware of potential further regulation, the *SWMP26* still endorses dissemination of the material in the environment through land application⁸¹ ... Several New York municipalities have already acted where broader regulation has lagged. Guilderland, Albany County, and Thurston, among others, have enacted local bans or restrictions on the land application of sewage sludge within their jurisdictions.⁸² Indeed, New York agencies are also pushing forward policies that increase PFAS testing and restrict the use of sewage sludge⁸³ ... A bill that freezes the sale and use of biosolids in all of New York is currently moving through the New York State Legislature.⁸⁴ (CSFL)

DSNY should also track and advocate for regulations that monitor and curtail public exposure to PFAS from sewage sludge in New York ... DSNY should also track and advocate for regulations that ban the land application of sewage sludge and sludge-derived materials in New York ... DSNY should track and advocate for regulations that control and minimize upstream pollutants that enter the wastewater system. (CSFL)

Land application creates severe negative externalities by introducing PFAS and other persistent toxins into food systems and water ... Any short-term cost savings in the land application of sewage sludge is unjustifiable in the face of its significant long-term costs ... Land application of sewage sludge also disproportionately impacts farmers and rural communities ... triggering cascading liabilities and health risks that persist for centuries, forcing some farmers off their land and ruining livelihoods. Recognizing this, the New York Farm Bureau recently stated its opposition to the land application of biosolids that have detectable amounts of PFAS and/or elevated levels of heavy metals and encouraged the testing of all sludge prior to spreading⁸⁵ ... Entities involved in the production, distribution, and downstream management of PFAS-contaminated materials—including wastewater utilities and municipalities—face increasing exposure to legal claims related to public health harms, environmental contamination, property damage, and economic loss. (CSFL)

There is also the problem of resulting groundwater contamination, including from PFAS, that requires costly remediation, as at the Brookhaven Landfill and surrounding residential communities. Landfill leachate containing toxics from industrial waste dumped in landfills is not typically treated onsite by the disposal company, but is piped or trucked to municipal sewage treatment plants. The resulting effluent enters waterways and the resulting sludge is contaminated with PFAS and other toxics. The sludge is spread on land—including farmland—or incinerated, or landfilled. Towns and counties in New York and other states have moratoria on land spreading of sewage sludge or have banned it. (CURES)

Comment 142. To build a cleaner, smarter, and more resilient New York City the final *SWMP26* should pair this vision with practical, performance-based tools to address PFAS “forever chemicals”... PFAS contamination must be managed at every step of biosolids management. Land application exposes NYC and taxpayers to CERCLA/Superfund liabilities and future cost shocks as thresholds tighten ... [For PFAS management in biosolids] Use Performance-Based Specifications, Not Prescriptive Technologies. Procurement and permitting should be performance-based so NYC does not preclude better solutions as they mature. Criteria should include: PFAS Destruction: ≥99.99% destruction/removal efficiency (DRE) for bulk PFAS; Technology readiness: TRL-6/7+, commercially available sub-systems; Water management: No hazardous wastewater liquid effluent; Permit-light footprint: Prioritize modular equipment with minimal site works and rapid deployment; and EJ and public health: Quantified community health benefits (local job creation, reduced truck-miles, mitigated odors, etc.) and minimized on-site stack emissions. (Decarb Energy Partners)

Response 142. Noted. The *SWMP* embraces the concept of performance-based specifications.

Comment 143. Including advanced thermochemical treatment as a recognized pathway supports both biosolids valorization and budget resilience by eliminating downstream PFAS risk. Text proposal: “PFAS risk will be explicitly evaluated in all biosolids valorization pathways. DSNY and DEP will prioritize pathways that either avoid PFAS redistribution or achieve verified destruction.” (Decarb Energy Partners)

Response 143. **Strategy 37** was revised to acknowledge the need for a testing protocol for emerging contaminants.

Comment 144. Add a PFAS Destruction & Circular Fuels Pilot Lane under Organics & Special Waste. To ensure the City can access the most competitive, high-TRL [technology readiness level] options, we urge DSNY to create technology-agnostic pilot lanes for thermochemical treatment of PFAS contaminated biosolids and related streams (e.g., FOG [fats, oils, and grease] concentrates, AFFF [aqueous film forming foam] residues, leachate concentrates) while also emphasizing energy recovery/valorization that supports NYC-anchored circular economies. Pair this with a joint DSNY-DEP pilot MOU and co-funding opportunities (e.g., SWIFR, NYSERDA, DEC/EFC SRF set-asides, plus City cost-share), and public-private partnerships to demonstrate emerging technologies at city-owned facilities. Text proposal: “DSNY and DEP will establish technology agnostic pilot programs at WRRFs to thermochemically treat PFAS-containing biosolids and related PFAS waste streams (e.g., FOG concentrates, AFFF residues), emphasizing energy recovery and valorization to support NYC-anchored circular economies.” (Decarb Energy Partners)

Response 144. DSNY will work with DEP and other stakeholders on the approach to advance new technologies as part of the implementation of *SWMP26*, considering research and demonstration/pilot projects as part of that effort.

Comment 145. We recommend that the City’s LSWMP acknowledge that sewage sludge is ubiquitously contaminated with PFAS “forever chemicals,” which are toxic even at the low concentrations. Scientific studies have shown that PFAS exposure increases the risk of many serious health conditions, including certain cancers, immune system problems (such as reduced response to vaccines), fatty liver disease, pre-eclampsia during pregnancy, and reproductive and developmental problems. PFAS are extremely difficult to destroy and they cannot be cost-effectively removed from sewage sludge, compost or soil once such materials are contaminated. Given the persistence of PFAS in our bodies and the environment, its mobility on water, and the fact that many plants take up PFAS as they grow, products derived from sewage sludge should never be used as a soil amendment or be considered for “beneficial use.” ... sewage sludge contains enormous amounts of micro and nanoplastics, which damage soil health and are taken up by many plants ... microplastics appear to lead to cardiovascular issues, respiratory problems, and cognitive decline and dementia, and research has only just begun on the effects of these tiny pieces of plastic on human health (CAAN)

Response 145. The City acknowledges that PFAS are ubiquitous in the environment and that all programs to recover resources should consider the implications of these substances in their management approaches.

Comment 146. Summary: Biosolids should undergo more testing for contaminants, with public disclosure of test results.

Response 146. DEC is responsible for materials testing and reporting requirements in New York. The City requires all products derived from materials management contracts to be distributed and utilized in compliance with all applicable rules and regulations. *SWMP26 Strategy 37* has been revised to address implementing a testing protocol for emerging contaminants.

Detailed Comments

The New York Department of Environmental Conservation’s use of EPA’s Method 1633 to test for PFAS in sewage sludge with no other tests, such as a Total Oxidizable Precursor and Total

Organofluorine assays, will systematically underestimate total PFAS concentrations in sewage sludge because it fails to account for precursors and polymeric PFAS⁸⁶ ... *SWMP26* also makes no reference to any testing of PFAS in sludge. Despite generating approximately 32% of all sewage sludge in New York State,⁸⁷ New York City has not provided transparent, publicly accessible information regarding PFAS testing of its sewage sludge. It is unclear whether routine PFAS testing has been conducted, which compounds have been analyzed, or how results—if they exist—have been used to inform management decisions. Absent comprehensive PFAS testing of sewage sludge, NYC cannot credibly claim that its sludge management practices are protective of public health. (CSFL)

I would like to focus on allocating funding for laboratory testing of composts and biosolids after they are produced, and ensuring data are publicly accessible ... After more outreach staff ensure more organics are diverted to numerous small-scale composting sites throughout the city and turned into high quality compost by permanently funded processing positions, there should be funding allocated to test these composts regularly for contaminants and nutrients. Virtually no testing on persistent organic pollutants in NYC's composts has been conducted, and testing on nutrients and other health properties can be cost prohibitive for compost producers. Biosolids in other states have been known to contain PFAS, and contaminant concentration data on NYC biosolids should be made publicly available for NYC as well. Transparency on the nutrient quality and contaminant risks of these materials should be taken seriously, particularly when they are applied to soil. (Pace University)

A strategy under our recommended initiative should include "Routine PFAS testing—including Method 1633, TOP and Total Organofluorine assays—of sewage sludge at all NYC Wastewater Treatment Plants and public disclosure of results." (CSFL)

Smart Bins

Comment 147. The demonstrated success of Smart Bins and the prior success of staffed community drop-offs point to an immediate and practical opportunity: more Smart Bins, more food scrap drop offs, and the support and development of local acceptance of clean, smaller-scale, community-based organics tonnages. These materials are well suited to aerobic composting and should be directed to composting operations at that scale. (MacBride)

Response 147. DSNY will consider your suggestions as part of the Organics Diversion and Recovery Program and notes that some community-based compost sites do not accept meat and dairy products, which are accepted in the Smart Bins.

Comment 148. Is DSNY planning to provide more Smart Bins and support expanded on-site composting on NYCHA campuses? I was told that bins were actually removed from at least one of the campuses. Why were they removed? (Allen)

Response 148. DSNY is not currently funded for additional Smart Bins. Bins are often moved due to low participation. NYCHA has been coordinating with DSNY on relocating/increasing locations of Smart Bins within NYCHA perimeters when and where possible.

NYC Urban Forest Agenda and Wood Recovery

Comment 149. On NYC Urban Forest Agenda: Forest for All, NYC highlighted the importance of ensuring the benefits of the urban forest accrue throughout all stages of the life cycle of NYC's trees—from seeds to wood waste ... I commend the inclusion of wood salvage and reuse as priority in *SWMP26* and am encouraged to see the proposed interagency collaboration with the NYC Department of Parks and Recreation (NYC Parks) to strategically plan and implement the first NYC Urban Forest Plan. (The Nature Conservancy)

Response 149. Your support is appreciated.

Comment 150. Summary: *SWMP26* should include recommendations for changes to policy, public procurement rules, collaboration across agencies, and dedicated DSNY infrastructure for the recovery of wood waste. DSNY should develop best practices and programming for salvaged wood reuse.

Response 150. Specifications can present a barrier for the use of new or sustainable products. DSNY will work with the Mayor's Office of Climate & Environmental Justice (MOCEJ), the Mayor's Office of Environmental Remediation (MOER), and other agencies to develop performance-based specifications with the goal of facilitating and encouraging the use of recovered organic material and soil on projects in New York City. Relevant *SWMP26* strategies include:

Strategy 36: Collaborate on the management of woody debris, including direct reuse (milling) through the *NYC Urban Forest Plan*, and on exploring technologies such as biochar production.

Strategy 50: Develop performance-based specifications for soils, compost, mulch, and other products.

Strategy 91: Develop C&D guidance for all covered City agencies.

Strategy 101: Work with industry, C&D waste processors, and City agencies to develop C&D material reuse incentives.

The following strategies that are part of the Waste Prevention and Reuse Program would also support recovery of wood waste and other organic materials:

Strategy 7: Support agencies, residents, nonprofits, and community organizations to engage in reuse and repair by offering technical assistance, strategic relationship development, and access to funding and donation opportunities.

Strategy 8: Identify opportunities for increased C&D salvaged material storage and refurbishment.

Strategy 9: Build C&D material expertise and promote deconstruction and reuse to designers, developers, and contractors to support connecting C&D supply and demand.

Detailed Comments

[The NYC Urban Forest Agenda] outlined the need for wood reuse policy and infrastructure to help transform wood waste into a sustainable local resource ... NYC has the opportunity to transform this wood into a local resource that is reintegrated into the NYC landscape. Currently, too much of this valuable material [wood] ends up in landfill and generates greenhouse gas emissions ... (The Nature Conservancy)

Investing in infrastructure such as decentralized hubs for staging and processing salvaged wood, and partnering with local reuse enterprises will maximize impact of waste reduction while also reducing transportation emissions. In a city as dense and expensive as New York City, having spaces to receive and store salvaged material will be an ongoing challenge. Permanent DSNY-hosted sites for staging and processing salvaged wood could unlock the logistics and economics needed to realize wood circularity in NYC and are essential to managing the inconsistent flow of material, including an influx of material during storms. These sites could also have the co-benefits of being local job hubs, material and sustainable design innovation partners, and educational and workforce development sites ... (The Nature Conservancy)

We recommend reforming the public procurement rules to ease purchasing and integration into capital projects of local salvaged wood material. (NYLCV)

It is critical for DSNY to adopt the practice of “best and highest use” of wood waste in DSNY’s management of salvaged wood. Direct beneficial uses, such as milling for lumber or furniture, should be prioritized to maximize carbon storage of wood waste, before opting for lower-value uses like biochar or mulch. (The Nature Conservancy)

DSNY should develop a comprehensive wood recovery framework that spans NYC Parks-managed wood and private sector construction and demolition (C&D) wood waste, creating a unified approach and economies of scale across the public and private sectors. Though the management and recovery of salvaged wood from felled NYC Parks trees and lumber salvaged from C&D are different and present unique logistical challenges, there is value to consolidating these materials in the waste stream. Supply consistency of NYC Parks-managed wood waste—the overall flow, quality, and species diversity of salvaged wood—depends on a variety of factors including extreme weather events. Opportunities to create a more consistent supply of salvaged wood will allow for steadier value generation and a stabler workforce. (The Nature Conservancy)

As a member of Forest for All NYC, we urge DSNY to collaborate with other city agencies to develop a tree wood reuse program in order to utilize reclaimed wood instead of sending it to landfills. (NYLCV)

We support DSNY’s involvement in the development of the city’s first Urban Forest Plan, as required by Local Law 148 of 2023. (NYLCV)

Suggested Technology

Comment 151. Summary: DSNY should explore new sorting technologies to improve organics and recycling diversion rates and include pyrolysis of organics for the beneficial use of biochar.

Response 151. DSNY will continue to proactively monitor MSW disposal capacity in the regional market, new sortation and recycling technologies, and novel opportunities for beneficial use and incorporate innovations into long-term planning efforts (**Strategy 70**). See response to **Comment 59** about doing business with New York City agencies.

Detailed Comments

AMP supports the City’s goal of increasing the “quality and quantity of organics diverted citywide” and its strategy to “continue to monitor advancements in technology related to the decontamination

of collected organics.” In line with the City’s proposed initiative to explore innovations in collection equipment and operations, AMP recommends the DSNY specifically consider innovative sortation technologies that are capable of sorting MSW waste streams to segregate and recover recyclable materials and organics for reuse. (AMP)

MSW-derived organics applications beyond composting should be explored, including pyrolysis of MSW-derived organics as a feedstock for the production of biochar, which can be used in concrete or asphalt applications, decarbonizing not only waste management, but building construction and paving projects in the city ... AMP supports the City’s initiative to monitor thermal treatment technologies, and encourages the City to include pyrolysis of MSW organics for the creation of biochar as part of its plan. Biochar from MSW can be used as an additive in cement/concrete production and asphalt paving, helping to decarbonize carbon-intensive industries active in New York City. (AMP)

AMP’s advanced automated MSW sortation capabilities enabled by AI provide detailed data on MSW stream composition, including specific recyclables captured in MSW. This provides municipalities with a broad range of data beyond recovery volumes, including recovery rates of specific commodities, offtake volumes and quality certification. It also arms municipal governments with data to inform decision making, ranging from benchmarking overall program success to infrastructure investment evaluation, cost effectiveness, areas for improvement and EPR compliance. Quality data will enable public policy focus on addressing quantifiable challenges and help close data gaps in solid waste generation and management. The data will also provide program success information for use in public education and outreach, demonstrating to the public, which overwhelmingly supports recycling, that their efforts and the City’s comprehensive program are worth the investment in time, resources, and funding. (AMP)

Comment 152. Our organization makes food waste recycling technology, and we work with over 200 U.S. and Canadian municipalities, building developers, and schools to help them decentralize their food waste management with our FoodCycler Programs ... We urge the SWMP to consider incorporating decentralized food waste technology into the Plan itself. The Plan identifies persistent challenges in multi-residential organics diversion. Decentralized processing technologies can address these barriers by eliminating odor, storage, pest, and rat concerns while simplifying participation at the unit level. Building-scale organics management aligns with the Plan’s commitment to local, circular systems that cut hauling emissions and create processing resilience within the five boroughs. Integrating decentralized food-waste systems supports DSNY’s waste equity vision by offering accessible diversion pathways in all building types, including dense or space-limited public housing. DSNY could also consider decentralized food-waste technologies within the Innovation and Demonstration Project framework, enabling the City to evaluate their role in achieving zero-waste objectives. We recognize decentralized food waste solutions are innovative, novel, and complex. If interested, we would also be open to a call to clarify any of the above points and provide additional information on how these programs operate. (Food Cycle Science)

Response 152. See response to **Comment 59** about doing business with New York City agencies.

Comment 153. While the draft plan includes several local elements, such as leveraging community organizations and local composting sites, the use of new innovations appears focused primarily on centralized

processing and disposal. We encourage DSNY to broaden the embrace of new technology to include distributed infrastructure innovations, such as the Mill food recycler, in the final plan to help reach the organics diversion goals included in the draft plan ... Diversion programs for organic materials generally, and food scraps in particular, benefit from a distributed processing infrastructure. By distributing the initial processing to the point of generation, e.g., such as a dehydrator, the organic material can be immediately stabilized before decomposition begins. This dramatically increases the quantity and quality of organics diverted and has a number of critical benefits, including reduced system costs. (Mill Industries)

Response 153. See response to **Comment 59** about doing business with New York City agencies.

Comment 154. Summary: Biochar can mitigate PFAS and other contaminants, and *SWMP26* should acknowledge and promote this and other beneficial uses of biochar, including in green infrastructure projects.

Response 154. DSNY will study and explore the use of biochar and work with multiple stakeholders as part of **Strategy 36** (collaborate on the management of woody debris, including direct reuse (milling) through the *NYC Urban Forest Plan*, and on exploring technologies such as biochar production). As part of *SWMP26* implementation, DSNY can also work with DEC to explore beneficial uses of biochar and BUD (Beneficial Use Determination) pathways.

Detailed Comments

USBC respectfully notes that [biochar] technologies can also play an important role in addressing per- and polyfluoroalkyl substances (PFAS), which are increasingly recognized as a critical challenge in biosolids management and land application. In addition to thermal destruction, the biochar produced through pyrolysis provides a complementary risk-management tool. Biochar's porous structure and large surface area enable adsorption and immobilization of PFAS molecules through hydrophobic, electrostatic, and surface-interaction mechanisms. When applied to soils or incorporated into engineered media, biochar can significantly reduce PFAS mobility, limiting leaching to groundwater and uptake into plants and food systems. In summary, pyrolysis offers an abatement method for biomass containing PFAS. Pyrolysis has demonstrated effectiveness in heavy metal immobilization in biosolids, micro- and nano-plastic destruction and elimination of other CECs such as pharmaceutical compounds often found in wastewater sludges. Beyond PFAS and other harmful material mitigation, biochar application offers co-benefits aligned with New York City priorities, including improved soil structure, increased water retention, enhanced soil fertility, and long-term carbon sequestration. These attributes support green infrastructure performance, land restoration, and climate-resilience objectives already articulated in the *Draft SWMP26* ... Pyrolysis and biochar represent a two-step strategy: high-temperature destruction of PFAS during thermal processing, followed by long-term immobilization and risk reduction through beneficial use of biochar. Explicitly recognizing these PFAS-related benefits within the final *SWMP26* would strengthen the Plan's public health protections, scientific rigor, and long-term sustainability outcomes. (USBC)

Broaden feedstock evaluation beyond biosolids. New York City should formally consider the potential for producing biochar from woody debris, organics separated from MSW, yard waste, compost-screening fines, and greenscape residues. These streams align with the City's objectives to increase diversion and beneficial use of organic-derived materials. (USBC)

Evaluate Biochar for Green Infrastructure and Climate-Resilience Projects: Biochar-enhanced soils offer improved infiltration, reduced CSO impacts, enhanced pollutant adsorption, and long-term carbon storage. This includes the use of biochar in concrete and asphalt infrastructure projects as an additional method to utilize organic biomass in a carbon-friendly application. (USBC)

Pursue Beneficial Use Determination (BUD) Pathways: Evaluating BUD pathways for biochar from multiple feedstocks will ensure safe and scalable adoption. (USBC)

Incorporate biochar into municipal soil and organic product programs. Integrating biochar into soils used across NYC Parks, NYCHA grounds, schoolyards, and landscaped corridors could strengthen performance and longevity of compost and mulch products already produced by the City. (USBC)

Establish Pilot-Scale Demonstration Projects at City-Owned Sites: These sites could support small-scale pyrolysis units, field tests, and product-performance monitoring to inform long-term planning. (USBC)

Explore Biochar as a tool to mitigate PFAS contamination: Biochar can significantly reduce PFAS mobility, limiting leaching to groundwater and uptake into plants and food systems. (USBC)

Comment 155. Summary: Mill Industry's food recycler technology can support SWMP26 composting and organics diversion goals as well as data collection and analysis.

Response 155. See response to **Comment 59** about doing business with New York City agencies.

Detailed Comments

Over the past two years, Mill has collected compelling data demonstrating [the Mill food recycler] impact. (Mill Industries)

When a Mill food recycler is full (which generally takes a few weeks), the user has a number of non-landfill options to use Food Grounds as a resource, which include: add them to your DSNY food scraps collection bin, furthering participation in the citywide collection; drop-off locations supported by DSNY; support the local food system by dropping off with a local community composting operation (Mill has previously partnered with local organizations including Big Reuse, Earth Matter NY and LES Ecology Center);⁸⁸ or for residents with a backyard or garden, use them to enhance compost; add directly to your lawn or as a direct nutrient-rich additive to garden soil. (Mill Industries)

Mill's food recycler has built-in scales and sensors that accurately measure the amount of food being processed, which provides one of the most in-depth views of wasting behavior in the country. This precise data on food scraps generation can significantly contribute to the DSNY initiative to improve data quality. This data fuels smarter decision-making for individuals and organizations ... Mill's data can inform waste characterization studies for both residential and commercial sectors and provide the granular data necessary to track and enforce commercial organics separation requirements. The data could also be leveraged to measure the efficacy and operational savings of DSNY's waste reduction efforts. (Mill Industries)

Mill's devices include educational signage and the device pairs with an app for residents to track total pounds diverted and individual impact, helping to drive behavior change. Mill has a large and engaged local customer base in NYC, and has published New York-specific guidance for Mill users. (Mill Industries)

As an innovator in food recycling technology with proven partnership models in both residential,⁸⁹ municipal,⁹⁰ and commercial⁹¹ settings, Mill sees tremendous opportunity in New York and we are eager to build on our previous work in the area to contribute to the City's ambitious diversion efforts. We are highly interested in participating in DSNY's focused groups, particularly the "organics processing capacity stakeholder process," to help establish replicable models and explore how Mill's technology can best integrate with New York City's long-term infrastructure and policy goals. (Mill Industries)

Comment 156. Decarb Energy stands ready to support New York's waste-to-value initiatives, aligned with the above performance criteria and circular offtake pathways ... Decarb Energy transforms wastewater sludge and other tough organic wastes into New York-made, carbon-negative biofuel [using the] Biosolids+™ Trailer ... a compact, factory-built, permit-light module ... We'd welcome the opportunity to introduce our company and technology to DSNY and DEP and explore how we can support NYC's waste-to-value goals. (Decarb Energy Partners)

Response 156. See response to **Comment 59** about doing business with New York City agencies.

Comment 157. Summary: South Jersey Industries' (SJI) Linden Renewable Energy project is a food waste recycling facility. SJI would like to support *SWMP26's* anaerobic digestion and waste-to-energy goals.

Response 157. See response to **Comment 59** about doing business with New York City agencies.

Detailed Comments

South Jersey Industries, Inc. (SJI), an energy infrastructure holding company based in Folsom, NJ, delivers energy services to customers through two primary subsidiaries: SJI Utilities (SJIU) and SJI Energy Enterprises (SJIEE). One of the key projects within SJIEE is Linden Renewable Energy, LLC (LRE)—a food waste recycling facility, currently under construction, designed to process source-separated food waste via anaerobic digestion and convert the food waste into various products, including renewable natural gas (RNG). Located in Linden, NJ, across the Arthur Kill from DSNY's Staten Island Composting Facility, LRE is strategically located to serve food waste generators and haulers ... (SJI)

Once fully operational in late 2026, LRE will be able to process up to 1,540 tons per day. In late 2026, LRE is scheduled to commence commercial operations and will be available to accept source separated organics (SSO) collected from within New York City. Construction of the LRE facility, roughly 15 miles from Manhattan, is more than 60% complete and is under contract with several New York City's Commercial Waste Zones (CWZ) authorized carters to process the SSO collected from commercial establishments. Tiger depackaging systems are currently in the process of being implemented at the CWZ carters' transfer stations in Queens and New Jersey to pre-process the SSO for LRE. While these facilities will primarily process SSO from the CWZs, all have the capacity to accept SSO from non-CWZ sources, to include DSNY collected SSO. (SJI)

South Jersey Industries and Linden Renewable Energy look forward to partnering with DSNY to formulate the policies of the future and support New York City in recovering resources from the residential and commercial waste stream, and reducing the volume of waste ultimately disposed. (SJI)

Comment 158. Establish micromobility hubs to reduce truck traffic servicing residents and businesses. DSNY organic waste separation could be enhanced by utilizing cargo bikes on the micromobility hubs along the public and commercial waterfronts. Smart Bins at public ferry terminals could increase commuter convenience in dropping off food scraps. Therefore, a DSNY operative should sit in on NYEDC outreach development sessions to inform residents and policy makers on how new technologies on the waterfront can save money and serve residents, businesses and developers in managing waste in their neighborhoods. Waterfront Industrial parks such as Brooklyn Marine terminal (BMT) and Brooklyn Army Terminal (BAT) could have a central consolidation point for bins delivered by Ebikes and stored for transport by roll on roll off barge. These networks would link up with NYC DOT Cargo bike corrals, loading and unloading zones further inland with minimum disruptions to residents ... The Department of Parks and Recreation also has marine operations at Sheepshead Bay Piers where organics from the charter fishing boats can be collected and transferred by water. In addition, there are 5 privately controlled marinas at Padergat Basin Park. Smart Bins at these locations as well as public ferry terminals would increase commuter convenience in dropping off food scraps. DSNY could make these organic services known to residents of the maritime community. (Garcia)

The city waterfront has always been part of the DSNY transport system. The Blue Highway Action Plan is a collaborative effort of the Department of Transportation (DOT) and the NYCEDC to improve the quality of life by reducing last mile delivery truck congestion. The construction of affordable housing will increase the influx of new residents and their commercial services. The off the streets and onto the water highway is a core component of the larger decarbonization strategy being advanced by the DOT. (Garcia)

Response 158. DSNY revised *SWMP26* to include information about the *Blue Highways Action Plan*, noting examples of materials that could increasingly be moved by water (including organic waste, salt, and building materials). **Strategy 34** was revised to acknowledge the variety of waste transportation modes available. With respect to the waterfront, DSNY and other stakeholders in the Blue Highways program are mindful of the need to balance waterfront recreational uses with the industrial and commercial uses that drive economic and environmental benefit to the city, such as the use of Marine Transfer Stations to take thousands of trucks off New York City streets on a daily basis. Parks will consider organics in future waste management planning at waterfront sites.

Comment 159. Since our forced shut down, I have attempted to have [the Commonpoint Queens compost] site reopened. One concept I came up with is microhauling. In our community, there are community activists who I met with and they organize weekly bike rides around Flushing Meadow Corona Park. I shared with them the concept of microhauling and they expressed interest in doing this. I have made numerous attempts to learn more about the opportunities and challenges of microhauling and have discovered resources to support this are few and far between. As we think about how to better manage our compostable waste, microhauling could provide us with a low cost, environmentally friendly way to get food scraps to locations where they could be composted. I strongly encourage resources to be provided in our proposed Solid Waste Management Plan to help us grow our ability to microhaul. (Laster)

I want everyone to think about microhaulers, like the hotboxes in Harlem. [These groups are] incredibly important to this ecosystem. (QBG)

- Response 159.** Micromobility could be included as part of **Strategy 34** (initiate the organics processing capacity stakeholder process inclusive of various scales of processing and transportation modes) and **Strategy 70** (DSNY will continue to proactively monitor MSW disposal capacity in the regional market, new sortation and recycling technologies, and novel opportunities for beneficial use and incorporate innovations into long-term planning efforts).
- Comment 160.** DSNY should have academic institutions work with the NYC Department of Design and Construction (DDC) and Department of City Planning (DCP) in the creation of new waste management models. EXAMPLES FROM MANHATTAN ... Where designers had to catch up with new transportation models: 2nd Avenue & Houston St. ... No location available for excess organics pickup ... [Commenter provided photos and additional examples] (Garcia)
- Response 160.** DSNY will collaborate with the Department of Design and Construction (DDC) (including Town+Gown <https://www.nyc.gov/site/ddc/about/town-gown.page> programs with academic institutions), the Department of City Planning (DCP), and other agencies to study and improve the integration of waste management infrastructure in building design and urban planning as part of **SWMP26 Strategy 57** (partner with City agencies to increase participation in recycling programs for MGP and paper) and **Initiative 3.4** (increase residential, agency, and institutional recycling participation and quality).
- Comment 161.** [For organics, explore all available tools to optimize diversion ...] [The City approved] in-sink food waste disposers [in 1997]. The simple premises behind their consideration include that food is mostly water and can be conveniently converted into a slurry and managed as a liquid through existing conveyance and processing systems ... [Studies of in-sink food waste disposers found] a reduction in food waste of 30% to 60% among first-time users, most of whom lived in low- and moderate-income homes and apartments ... DSNY's messaging about organics has focused on truck-based collection and drop-offs—both of which are inadequate tools—even as it promotes co-digestion as an effective solution for converting food waste into clean water, renewable energy and fertilizer products. And DEP has focused on truck-based delivery of pre-slurried food waste to its anaerobic digesters at the Newtown Creek Wastewater Resource Recovery Facility. (GS)
- Response 161.** Yes, in-sink disposers are allowable in residential applications. They are not, however, permitted for commercial use. See: <https://rules.cityofnewyork.us/rule/food-waste-liquefiers/>
- Comment 162.** DSNY should research and test new technology to ingest [labelled/certified] compostable materials (like containers) since so many of those products are being utilized now. (NYLCV)
- Will DSNY encourage and facilitate the use of in-vessel systems at NYCHA (and elsewhere)? In reading the SWMP, I became aware that in-vessel is an option for commercial businesses but they have to be registered. Please provide a list of those registered in vessel locations in the final SWMP and collect additional data to get a better sense of the capacity and tonnage of each (if that is not already provided). Does DSNY have any plans to encourage and promote in-vessel composting more widely throughout the city? If not, why is that not a viable, feasible option? (Allen)
- Response 162.** DSNY acknowledges the benefits of on-site organics management including reduced storage and transportation requirements. Businesses covered by the Commercial Organics Rules that choose to process on-site must do so through in-vessel composting or any processing method approved by

DSNY rule that does not discharge food waste into sewers. All such equipment must be registered with DSNY within 30 days of installation and renewed annually using the online commercial organics on-site processing registration available on DSNY's website:

<https://www.nyc.gov/assets/dsny/forms/commercial-organics-on-site-processing-registration>.

DSNY will consider in-vessel composting and other onsite management techniques as part of **Strategy 34** (initiate the organics processing capacity stakeholder process inclusive of various scales of processing and transportation modes).

For those businesses that currently have installed an aerobic or anaerobic digestion system, all such processing equipment must *already be registered* with DSNY, and the registration must be renewed annually.

These businesses must:

- Post an official processing decal supplied by DSNY.
- Weigh and measure by volume the amount of organic waste processed and retain these records for at least three years to make available to DSNY upon request.
- Transport any material that is not able to be processed on-site using one of the other options.

General/Other

Comment 163. More information should also be provided on the stakeholder process DSNY will be initiating for organics processing capacity. What will this process look like, what are the goals and timeline? What will DSNY's role be after it is initiated and who are the anticipated stakeholders? Will SWABs be included to provide input? (Allen)

Response 163. **Table 6-2** in *SWMP26* shows the proposed timeline for the stakeholder process is from 2027-2030. The stakeholder process would be inclusive of all scales of processing, meaning that DSNY will engage with stakeholders regarding small-scale composting sites as well as medium to large-scale composting and organics processing facilities.

Comment 164. I was surprised to read the BAU [business as usual] vs IPP [implementation of proposed programs] projections for organics diversion. Overall, it was hard for me to identify what is new and improved in the IPP plan that isn't in BAU. IPP seems to be just doing a little more of the same things, which has not moved the needle enough. Nothing new or innovative was proposed for increasing participation. All this while, recycling rates falter. (Allen)

Under BAU, organics flatlines at 9.4% for 10 years. Meanwhile organics diversion citywide in December 2025 was 8%—down from close to 11% in November. Can DSNY explain how they came up with these numbers and how they determined organics would stay flatlined under BAU? (Allen)

Response 164. The DSNY-managed projections were developed in mid-2025. As the Citywide Residential Organics Program has grown significantly since 2023, the baseline year used for other waste streams, it was determined that it would be most appropriate to estimate 2025 DSNY-managed organics diversion. The approach used to estimate organics diversion in 2025 and future years

included several assumptions, including a consistent diversion rate in the latter half of 2025 and future years.

Available monthly data for the rolled out Citywide Organics Data was used to estimate 2025 annual curbside and containerized monthly diversion tonnage as well as average diversion rate. The months used to calculate these averages included October 2024 through July 2025. The average monthly diversion and diversion rate for curbside and containerized organics were used to estimate August through December 2025. In addition to curbside and containerized organics, annual averages were used to estimate non-curbside or containerized DSNY-managed organics.

In the business-as-usual (BAU) scenario, it was assumed that there would be no additional organics curbside programming that would result in a change in the diversion rate. However, due to projected population increases, this scenario still assumes an increase in the amount of organics diverted through the Citywide Residential Organics Program. The assumption that the diversion rate for organics remains the same throughout the planning period parallels the approaches for other waste streams presented in the DSNY-managed BAU scenario. For instance, the rate of paper diversion was 43.5% in 2023 and is modeled as remaining 43.5% in subsequent years in the BAU scenario. The BAU scenario is in contrast to the implementation of proposed programs (IPP) scenario, in which additional effort and organics waste reduction and diversion programming would result in a diversion rate of 30% by 2036.

Comment 165. School organics collection should also be tracked separately for open data. Similarly, data from the orange bins [Smart Bins] should also be collected and made public on open data. The plan included some general numbers of users and bin opening, but additional data including tonnage and users per bin should be made available. (Allen)

It is well known that other organics collection pathways—most notably Smart Bins and, historically, staffed food scrap drop-off sites—produce far cleaner material streams. At present, this distinction is obscured by the Department of Sanitation’s resistance to reporting school organics tonnages separately from Smart Bin tonnages and to providing full, transparent data on the size and composition of the school waste stream. As a result, materially distinct streams are aggregated in ways that undermine informed system design and policy evaluation. (MacBride)

Response 165. Organics collections from schools occur on the same routes as residential collections. While DSNY is committed to data transparency and improvements to data collection, analysis, and reporting, DSNY will not determine waste collection routing based on data collection. DSNY will continue to report available data and will collaborate with NYCPS to optimize available data for school outreach and training. Information on the composition of school waste is available in the *2023 Waste Characterization Study*.

Comment 166. We are pleased to see that the 2025 Mayor’s Management Report⁹² stated that in Fiscal [Year] 2025, DSNY disposed of 3,154,600 tons of refuse—2% less than Fiscal 2024, and the lowest total in 15 years. The Department diverted 166,500 tons of organic waste in Fiscal 2025, a 29% increase from Fiscal 2024, a historic high. (NYLCV)

Response 166. Thank you for your support.

Comment 167. Despite the significant progress made in some areas since the broad adoption of municipal recycling and diversion programs, keeping organics out of the landfill has proven to be a particularly difficult challenge. Even well-funded, long-standing municipal organics programs that rely on centralized collection, processing, and disposal continue to face high contamination and low adoption. (Mill Industries)

Response 167. Increasing the quantity and quality of organics collection is a major priority for DSNY. *SWMP26* describes the Organics Diversion and Recovery Program, which includes 31 strategies to increase participation in organics programs and the capture rate of organics while reducing contamination. These strategies include studying alternatives to clear plastic bin liners for organics collection and promotion of paper bags for leaf and yard waste collection, increasing access to organics recycling for NYCHA residents, promoting food donation and rescue, and continuing to support community composting groups. See **Strategies 23-53** for additional details.

Comment 168. “These programs were developed after reviewing best practices for large cities worldwide, consulting resources provided by the state, city and key stakeholders, and analyzing the city’s existing conditions.” The SWMP did not elaborate on any key learnings from other cities that could be implemented in NYC to reduce waste. DSNY should provide a report on its research on other cities in the final SWMP. (Allen)

Response 168. While DSNY did research best practices used in other cities, materials were not compiled in a report or similar format. This is out of scope of the DEC Local Solid Waste Management Plan development process; however, it can be incorporated into implementation, specifically for the following strategies:

Strategy 15. Conduct reuse sector research, prepare biennial reports, and include reuse data in city metrics on diversion.

Strategy 17. Research, report on, and consider incentive-based policies as mechanisms to increase diversion, reduce single-use items, and minimize toxicity in New York City waste streams.

Strategy 20. Develop a virtual hub to increase coordination, compile research, collect data, and share best practices.

Strategy 21. Support market development, research economic models, and develop contractual provisions to facilitate material reuse and material with recycled content, including reclaimed soil.

Strategy 29. Continue to monitor advancements in technology related to the decontamination of collected organics.

Strategy 70. Continue to proactively monitor MSW disposal capacity in the regional market, new sortation and recycling technologies, and novel opportunities for beneficial use and incorporate innovations into long-term planning efforts.

Strategy 78. Continue to monitor this field [thermal treatment technologies] through market and technology research, attendance at industry conferences, and attention to state and federal policy development, reporting on updated findings in SWMP biennial reports.

Strategy 86. Research barriers to higher commercial and industrial diversion rates and identify potential solutions.

Strategy 99. Advance research and identify infrastructure for reuse and remanufacturing.

Comment 169. DSNY is projecting further doublings of the organics capture rate over the next four years, with the goal of increasing organics diversion from the current 2.5 percent to somewhere near 14 percent ... (MacBride)

Response 169. Capture rate measures recyclable materials that are properly recycled in their respective recycling streams as a percentage of the total aggregate of that material across all streams, whereas diversion is the percentage of all waste that is diverted away from disposal through recycling, composting, or other beneficial use. In 2023, the residential organics capture rate was approximately 2.5%, and the commentor is correct in noting that in 2030, the residential organics capture rate is projected to be approximately 14%. Based on monthly organics data published in NYC OpenData, in 2025, DSNY collected over 126,000 tons of organics from residents and NYCPS, greater than the estimated 110,000 tons used in the *SWMP26* projections. The estimated total tonnage of diverted organics (including residential, NYCPS, private landscaper leaf and yard waste, other organics collection, and Rikers Island food waste) in 2025 that was used in projections was 141,000 tons. This estimate was developed for the *Draft SWMP26* which was published before the end of 2025 and therefore before the full dataset for the year was available. DSNY projects that over 217,000 tons of organics would be collected from residents and NYCPS in 2030 under the IPP scenario. The projected 2030 IPP amount with the addition of other DSNY-managed or supported organics is approximately 277,000 tons, as reported in **Table 7-15**.

Comment 170. Increase organics processing capacity within and close to the city. (CZWD)

Response 170. DSNY will work on increasing organics processing capacity within and close to the city as part of the organics processing capacity stakeholder process described in **Strategy 34**. DSNY will also participate in planning for the future of Rikers Island and the related potential for additional composting capacity (**Strategy 33**) and establish eight new composting locations and upgrade, as necessary, the 17 existing facilities per Local Law 118 of 2024 (**Strategy 35**).

Comment 171. Consider policies to ban organics from landfill and WtE. (CZWD)

Response 171. DSNY will work with New York City Council to expand organics separation requirements to include all businesses and to prioritize donation (**Strategy 84**). Based on recent input from the New York City Council, **Strategy 84** may be further expanded to include institutions with feeding operations. DSNY would report on this and any future updates to strategies in the biennial reports to DEC. DSNY sees *SWMP26* as an overarching plan that can continue to be refined over the implementation period. This would make organics separation mandatory for New York City residents, businesses, and most institutions, effectively banning most organics from disposal.

Comment 172. For organics, explore all available tools to optimize diversion—including intensive focus on food waste prevention, which can yield significant benefits both to residents and to the city's organics management systems ... the affordability impacts of wasted food make this a compelling opportunity for investment and public leadership. (GS)

Response 172. **Initiative 2.5**, to promote food donation and rescue, aims to reduce food waste before it's generated. DSNY will maintain and modernize the donateNYC platform (**Strategy 118**), which

includes the donateNYC Food Portal. DSNY will also work with New York City Council to expand organics separation requirements to include all businesses and prioritize donation (**Strategy 84**).

Comment 173. Work with all schools to ensure they separate the compostable trays and food waste. (CZWD)

Response 173. DSNY and NYCPS will continue to collaborate to improve organics separation at schools.

Comment 174. USBC expresses strong support for the biochar-related strategies the City has already incorporated into the Draft Plan ... We strongly support the Plan's intention to explore in-city beneficial uses for wastewater-derived products—including biochar—and to develop local markets for such materials ... including applications in engineered soils, green infrastructure, and landscaping. Research across the U.S. demonstrates biochar's effectiveness in improving soil performance, enhancing stormwater capture, and reducing nutrient loss ... This approach aligns with circular-economy principles and promotes a sustainable municipal procurement ecosystem ... The City's recognition of biochar as a climate-beneficial, resource-recovery product represents a major step toward modern, sustainable waste management. Strengthening and expanding the initiatives outlined in the Plan will position New York City as a national model for biochar integration and circular-economy innovation. USBC applauds New York City's linkage of biochar initiatives to DEP's Energy and Carbon Neutrality Plan. Biochar's long-term carbon sequestration potential aligns directly with the City's goals to eliminate biosolids landfilling and significantly reduce greenhouse-gas emissions. (USBC)

Response 174. Noted.

Comment 175. The Draft Plan's explicit recognition of biochar as a principal product of biosolids pyrolysis reflects a sophisticated understanding of its high utility, stability, and environmental value. Identifying biochar within DEP's Biosolids Master Plan underscores the City's commitment to modernizing biosolids management with low-emission, resource-positive technologies. (USBC)

Response 175. Noted.

Comment 176. SJI and LRE respectfully suggest that DSNY consider utilizing NYC-owned Marine Transfer Stations (MTS) to transport SSO [source-separated organics] from DSNY directly to organics recycling facilities. [East 91st] Street and [Southwest] MTS are currently underutilized, and both have near-term potential to support the overall waste flow. Current DSNY's experience with depackaging systems, such as Tiger at the Staten Island Composting Facility, could be replicated at both E91 and SW Marine. Through the use of existing infrastructure and transportation networks, additional vehicle miles traveled will be minimized—keeping with New York City's objective under the "Blue Highways Action Plan." (SJI)

Response 176. DSNY currently has contracts with facilities that pre-process and transfer materials to organics recycling facilities, including composting facilities and Newtown Creek's anaerobic digesters. Some organic material is brought directly to Soundview Park and Staten Island Compost Facility. Adding pre-processing equipment at Marine Transfer Stations would require funding, planning, and operational changes that are not within the scope of SWMP26. However, DSNY may consider alternative vendors when organics processing contracts end that would be more conducive to accepting material from MTSS.

Comment 177. Nothing in the 2026 SWMP suggests that DSNY is engaging in serious, internally grounded analysis of how to improve recycling or organics capture in the curbside and containerized stream. On the contrary, the Plan's content suggests a continued inclination to seek diversion tonnage elsewhere—substituting peripheral activities for residential performance, and aggregating multi-sector tonnages in advantageous reporting—while avoiding accountability for the inefficiencies, fiscal impacts, and persistent stagnation of the City's flagship diversion programs. (MacBride)

Response 177. SWMP26 includes multiple strategies to improve the recovery of collected MGP and paper (**Initiative 3.2**) and increase the quality and quantity of organics diverted citywide (**Initiative 2.1**) primarily aimed at curbside collection programs. Strategies and initiatives under the Education and Outreach Program also aim to improve participation in curbside collection to increase the amount of material recovered and diverted from disposal.

Residential and Institutional Recycling Program

Containerization and Recycling

Comment 178. Summary: SWMP26 should include a citywide waste containerization program that includes incentives and dedicated organics and textiles bins to increase resident participation and diversion rates.

Response 178. SWMP26 includes **Strategies 65** and **67** for monitoring the effect of residential containerization on recycling capture rates and quality as well as advocating for state-level container redemption/return program and policy modernization, adapting New York City's recycling program as appropriate. This process will help inform future programs to increase diversion.

Detailed Comments

I'm not sure I agree with the plan's statement that the citywide Containerization Program is not directly related to the SWMP26 objective to reduce waste and increase diversion. If rolled out more thoughtfully and strategically, there would be a greater effort and priority to first divert organics from the mixed refuse empire bins and into dedicated organics bins alongside—which would also help with buildings who struggle to find enough room for brown bins. Empire bins should also be dedicated for textiles and reusable items, as many buildings don't have room for textile bins either. A pilot should be implemented asap as it could go a long way to increasing diversion of organics and textiles to start. (Allen)

DSNY should commit to including options for recycling and organics in its waste containerization program. New York City is long overdue for citywide, on-street, shared waste containers, which will bring our city in line with dozens of major cities globally. However, failing to include recycling and organics in these containers is a missed opportunity. DSNY's Future of Waste report recommended including bin space for all three types of waste, and DSNY is now rolling out three-section bins at schools. Yet the agency intends to use landfill-bound-trash-only bins for the citywide rollout. According to the Center for Zero Waste Design, "creating equally convenient waste drop off areas for trash, recycling, and organic waste leads to higher diversion rates." We must make it as easy as possible for residents to source separate recycling and organics, and having three

separate methods for disposal is confusing, unnecessary, and leaves unsightly recycling bags on our sidewalks. (Reynoso)

A smart containerization plan should be tied to a Save-as-You-Throw model based on bin or bag size to incentivize separation of recycling and organics. This is in line with the 2026 Draft's recommendation to "study incentive-based waste management policies." (Reynoso)

Waste Containerization must be tailored to ensure it supports waste reduction and diversion, and needs to be part of the SWMP. We believe that the current rules and plans for trash-only containerization will reduce waste diversion and would suggest improvements that would be better for diversion, labor and the quality of NYC streets. For more see our On Containerization Report,⁹³ and shorter pitch document.⁹⁴ We would like to see our alternative recommendations for waste containerization piloted and evaluated against the current plans in terms of waste diversion, labor, costs to buildings and DSNY, streetscape cleanliness and number of bins on sidewalks. See our recommendations for the EIS report.⁹⁵ Current waste containerization plans need to be evaluated fully and compared to pilots of our recommendations before expansion. (CZWD)

Mixed Waste Processing

Comment 179. Summary: Mixed-waste processing using advanced sortation systems should be part of the *SWMP26* Residential and Institutional Recycling Program, as it will increase recovery and diversion rates, reduce landfilling, and reduce transportation costs.

Response 179. *SWMP26* focuses on diverting recyclables and other materials upstream through the following programs: Waste Prevention and Reuse, Organics Diversion and Recovery, Residential and Institutional Recycling, Commercial and Industrial Waste, Construction and Demolition Waste, and Special Waste. The Education and Outreach Program supports the successful implementation of all other programs. The implementation of *SWMP26* is expected to result in a projected 30.5% diversion rate for DSNY-managed municipal solid waste and 54.7% diversion rate for New York City commercial waste as described in **Chapter 7** of *SWMP26*.

Detailed Comments

Draft SWMP2026 does not discuss the use of mixed waste processing despite previous unmet goals for diversion rates and potential increases in landfill reliance. Mixed waste processing, sorting collected municipal waste to recover recyclables such as metals, plastics, and paper, was tested by DSNY in low-diversion districts and could increase diversion by recovering valuable materials from what would otherwise be residual waste.⁹⁶ As such, mixed waste processing should be identified as a complementary tool within the *SWMP2026* to recover additional materials from residuals, reduce additional landfill usage, and improve overall system performance rather than relying solely on source separation and traditional recycling alone. (CCNY EEC)

AMP supports the Residential Recycling Programs initiative to "improve the recovery of collected MGP and paper." AMP specifically recommends the DSNY expand its recycling program to recover recyclables, including metals and plastics, from large volumes of MSW through the use of advanced sortation systems capable of visually identifying and separating valuable materials from mixed MSW streams. This would be complementary to the City's existing curbside recycling programs; the benefits of adding advanced sortation of MSW prior to export and disposal at

landfills or WTE facilities include: substantial increase in recycling volumes; reduced cost of transporting MSW to landfills and WTE facilities; reduced MSW volumes disposed of in landfills or WTE; disposal cost reductions; increased commodity revenue; improved greenhouse gas mitigation/decarbonization from landfill diversion and reduced long distance waste transport; improved compliance with future, evolving EPR legislation; data collection on volumes of recyclables in MSW and materials recovered ... [and] will help New York City meet its current and future sustainability goals and Extended Producer Responsibility (EPR) requirements. It will help reduce reliance on external disposal capacity that requires long-distance transport, and enable internal oversight efficiencies. (AMP)

Comment 180. Invest in industry development initiatives for the materials recovery sector. Go beyond legislation and regulation to support innovative companies with job-creating solutions for newly-targeted but hard-to- recycle discarded materials—e.g., carpeting, building materials, mattresses, batteries, glass, etc.—and state-of-the-art processing systems for conventional designated recyclable materials. Each of those represent emerging industries for which targeted investments could accelerate their development ... engage industry stakeholders and experts for ideas and support. (GS)

Response 180. DSNY will consider the suggestion as part of **Initiative 1.7**, convene New York City’s circular economy stakeholders. *SWMP26* also includes strategies to launch pilot projects to increase access to reuse and repair of textiles procured or mandated by the City (**Strategy 6**) and to promote at least one pilot of reusable packaging with a New York City partner (**Strategy 10**).

Extended Producer Responsibility (EPR)

Comment 181. Summary: *SWMP26* initiatives that will advance EPR programs and therefore reduce plastic packaging are strongly supported.

Response 181. DSNY appreciates your support for EPR policies and programs. *SWMP26* includes numerous strategies to advance EPR, including: working with DEC to implement state law on carpet EPR in New York City (**Strategy 60**), working with other local governments across the state to advance an EPR program for mattresses (**Strategy 61**), monitoring progress on EPR policy for packaging in other jurisdictions and advocating for and advancing EPR policy for packaging in accordance with *PlaNYC* and state legislative efforts (**Strategy 62**), working with state legislators to update EPR policies for batteries (**Strategy 104**), supporting New York State EPR initiatives and identifying opportunities to support photovoltaic module recycling in City planning and programs (**Strategy 105**), and supporting City and State EPR initiatives for gas cylinders (**Strategy 107**).

Detailed Comments

NYLCV strongly supports DSNY’s work advancing an EPR for packaging program at the state level, which would require companies to reduce packaging, increase the recyclability of their products, and increase the use of post-recycled content. (NYLCV)

MCB4 also expresses strong support for the Solid Waste Management Plan’s commitment to expanding Extended Producer Responsibility (EPR) programs ... these initiatives address some of the most challenging materials in the waste stream. We also underscore the need to reduce the

use of hard-to-recycle packaging materials overall so that producers, rather than residents or the municipal waste system, bear responsibility for wasteful or non-recyclable product design. Plastic packaging has become an increasingly large part of the municipal solid waste stream and EPR will render them easier to capture and recycle. We look forward to the day when packaging is further reduced and such packaging that exists can be readily collected and remanufactured for additional use thus adding to the robustness of the circular economy. Strengthening and expanding EPR programs will improve diversion rates, enhance safety, reduce disposal costs and support the City's transition to a more sustainable circular economy. (MCB4)

As an active operator and investor in NYC's Circular Economy—we support DSNY in its proposal to engage stakeholders to turn its ideas into action ... Together with sustainability experts, Eunomia, we studied the best systems around the world and combined them into what we call Historic Resource System. Underlined by extended producer responsibility (EPR), policies that make producers part of the solution for a circular economy, and committed to higher recycling rates and a holistic approach to waste management, bring together three key elements: Deposit return systems (DRS); Proven to collect beverage containers with high quality for recycling and reuse. Separate collection; Sorting post-consumer materials at the source to improve recycling efficiency. Mixed waste sorting; Pulling valuable recyclables out of general waste streams before they're lost to incineration or landfill. For plastics, mixed waste sorting coupled with advanced mechanical recycling or chemical recycling, where advanced mechanical recycling is not feasible, turns these materials back into usable substances. By viewing these systems as complimentary, New York could boost recycling rates, lower greenhouse gas emissions, and make real progress towards circularity. (TOMRA)

... The best way to keep waste out of landfills is to not produce the waste in the first place. I am pleased to see DSNY express its support for packaging reuse and reduction, including a pilot NYC program and support for State legislation on Extended Producer Responsibility (EPR) and updating the Bottle Bill to increase diversion. (Reynoso)

Advance extended producer responsibility and packaging reduction policies. (MSWAB)

Returnable Container Act

Comment 182. Summary: SWMP26 should strongly advocate for updating the Bottle Bill. Increasing the deposit to \$.10 or more would increase redemption rates, support the circular economy, and support independent recyclers ("canners") who contribute to the local economy and help keep their communities clean.

Response 182. DSNY, in coordination with the Mayor's Office, monitors all state legislation related to sanitation and solid waste management and agrees that incentive programs, such as deposit return systems (DRS), can increase diversion and recycling rates. DSNY updated SWMP26 **Strategy 67** from "Monitor state-level container redemption/return program and policy development, adapting New York City's recycling program as appropriate" to "Advocate for state-level container redemption/return program and policy modernization, adapting New York City's recycling program as appropriate."

Detailed Comments

We commend DSNY for its comments on the NYS Bottle Bill and urge you to continue advocacy for updated legislative and regulatory amendments to this law to best serve New Yorkers. (EANY) (Scovell) (Bargholz)

New York's Bottle Bill has proven to be a highly effective program to reduce litter and increase recycling rates. In 2023, New York's redemption rate was at 68.3%.⁹⁷ The Bottle Bill reduced roadside container litter by 70% and in 2024, more than six billion containers were redeemed in the state⁹⁸ ... Additionally, states with bottle deposit laws have better recycling rates than non-deposit states. According to the Container Recycling Institute, states with bottle deposit laws have a beverage container recycling rate of around 60%, while non-deposit states only reach about 24%.⁹⁹ Michigan, Connecticut, and Oregon already carry a 10-cent bottle deposit, leading to higher redemption rates¹⁰⁰ ... The expansion of the state's Bottle Bill [would] increase recycling rates and make New York's environment and communities cleaner. (NYPIRG)

The Bottle Bill works, period. It's demonstrated its efficacy continuously for decades, resulting in the diversion of millions of tons of waste and vast reductions in litter in our communities. It's the most effective recycling system we have, resulting in the diversion of millions of tons of waste and vast reductions in litter in our communities without cost to the state—in fact, it generates revenue through unclaimed deposits. Today it captures around 70% of the material it covers ... our streets, landfills, and waterways are filling with beverage containers, new and old, that aren't included in the system ... If the paralysis around this issue continues, all New Yorkers' lives will continue to be severely affected: their communities will be more littered, their waterways more polluted, and their income hampered. (Sure We Can)

Bottle Bill: Considering that this program has been performing for over 40 years, and incorporates many EPR principles, the Draft Plan is relatively weak in terms of how it shares its contributions to New York City. Missing are opportunities to talk about the impact on litter, jobs, manufacturing, and public engagement. The Plan only recommends that DSNY "monitor program development" (see pg. 147) as the NY legislature considers modernizing the program. DSNY should strengthen this section by including a commitment to work with the legislature to support modernization and by setting out best practices that DSNY supports. (TOMRA)

The draft plan also talks about monitoring New York State's 1982 Returnable Container Act, referred to as the Bottle Bill. More than monitoring, I urge the Sanitation Department to really push for the modernization of this bill which expands the types of containers eligible for redemption and increases the redemption rate to 10 cents a container. These changes would help reduce the amount that the sanitation department needs to collect, create green jobs, and clean our streets. The draft plan noted the current redemption system's effectiveness when it said that "in 2020, (redemption) resulted in the recovery of 5.5 billion containers (over 240,000 tons of material) across New York State." Expanding the system will mean more containers are recovered rather than going to landfills or into waterways. (Leonard)

There is also pending state legislation to modernize the 43-year-old bottle deposit system (Bigger Better Bottle Bill S5684 / A6542). The SWMP draft merely notes that DSNY will "monitor" the bottle deposit system. That is not enough. Expanding the type of containers eligible for redemption and increasing the redemption incentive to ten cents will go far in creating the circular economy DSNY

says it is working towards. NYPIRG reports that modernization of the bottle bill would save local governments across the state as much as \$108 million annually. (Leonard).

The [Returnable Container Act, aka Bottle Bill] has been on the books for four decades and covers beer, soda, and water containers. Sports drinks, ice teas, other non-carbonated beverages, wine and alcohol are not covered by the law. The deposit has been frozen at a nickel since 1982. Efforts to modernize the law have failed due to industry opposition. (NYPIRG)

[City support] of legislation to modernize the Bottle Bill ... would: further reduce the amount of solid waste the City would otherwise have to dispose; reduce the contamination of the current waste stream, particularly through the removal of glass containers; generate taxpayer savings for City residents. (NYPIRG)

An expansion of the Bottle Bill would result in increased economic opportunities for New Yorkers. If the law is modernized, New Yorkers can expect 1,866 new jobs to be created.¹⁰¹ ... It would also help municipal recycling programs that are currently facing a recycling crisis. (NYPIRG)

Important steps needed to modernize the [Returnable Container Act include]: Expand the Bottle Bill to include wine, spirits, hard cider, and most non-carbonated beverages. ... The expansion of the Bottle Bill to include wine, spirits, and hard cider would take a significant amount of the containers that municipalities are struggling with off their hands.¹⁰² ... A deposit system can dramatically reduce litter and solid waste that would otherwise be discarded. Other states have already added these containers. (NYPIRG)

There is strong public support for modernizing the Bottle Bill. In a recent public poll conducted by Siena Research Institute, there was strong public support for increasing the “Bottle Bill” deposit to a dime, arguable the most controversial item in the reform package¹⁰³ ... Support actually increased slightly for those working on lower income levels (62% for those making less than \$50k per year and 60% for those making \$100k per year). (NYPIRG)

The City—as a whole—stands to benefit from modernization. NYPRG therefore urges that the City embrace modernization legislation and add its considerable institutional authority to help advance the bill this session. NYPIRG urges that the City support modernization of the “Bottle Bill” and include an analysis of the proposal’s savings as part of its Solid Waste Plan. (NYPIRG)

New York City’s contract¹⁰⁴ regarding its solid waste program contains a specific reference to the “Bottle Bill.” That contract essentially provides that the City would have to change its compensation to its vendor in the circumstance that the “Bottle Bill” was changed in any way—improved or repealed. It is that provision that has been used as a rationale for the City’s opposition to the “Bottle Bill” legislation. (NYPIRG)

The opponents of this system—often polluters who seem to regard the idea of being asked to help clean up their own mess as an unconscionable moral affront—speak of updating the system as if it will cause the sky to crash down on them. “Prices will skyrocket, people will stop drinking beverages!” They said the same thing in 1982 when the Bottle Bill was first enacted. They said the same thing in 2009 when it was previously expanded. Now it’s 2025, and they seem to hope we will have forgotten that the sky never fell, people buy and drink more beverages than ever, and that it is exactly rising prices that make this issue so urgent. A Siena poll conducted in 2024¹⁰⁵ showed that a majority of low-income New Yorkers, those most impacted by inflation and higher costs at the grocery store, favor the Bottle Bill and want it expanded and supported. In fact, studies have shown

that someone redeeming Bottle Bill material is most likely to spend the money they earn from redemption in the same venue at which they redeemed, meaning taking your bottles and cans back to the store can actually help reduce the cost of a grocery bill. (Sure We Can)

Urgent action needs to be taken to keep our communities from being buried underneath the overwhelming burdens of pollution and climate change, and that hard-fought and successful environmental and economic policy isn't lost because of regressive and short-term thinking. The consequences of inaction are evident—New Yorkers are in real danger of losing their lives or livelihoods. Small businesses and independent workers across the city are abandoning the work of the circular economy because their income, controlled by the law, is simply insufficient ... [The Bottle Bill] supports small businesses and drives the circular economy. It's even become a mechanism for environmental justice, creating a low-barrier way for marginalized people from all kinds of backgrounds to become independent recyclers who work, contribute to their communities, and earn a livelihood. Professional canners are invested in their communities, and return to the same places—for this reason, they do not tend to leave a mess when they gather materials. (Sure We Can)

Support the passage of NYS Bigger Better Bottle Bill (S.5684 / A.6543), and increase redemption facilities in NYC by enforcing the requirement for grocery stores to provide takeback, and considering where additional facilities can be provided that are accessible for canners and the informal waste sector. Ensure infrastructure is designed to transition from single-use redemption beverages to reusable containers. (CZWD)

The City struggles to support even the simplest, most effective, and longest-standing recycling system in our state—the Bottle Bill—and the workers who drive its success. Though the SWMP mentions container-deposit redemption as a key way New Yorkers recycle, in practice the city has shied away from acknowledging or cultivating the value the system and those who participate in it offer our communities, ultimately resulting in diminished outcomes for New Yorkers. All DSNY proposes around this key issue is to “monitor state policy.”¹⁰⁶ ... The first step to a better situation is the city must wholeheartedly support the state's expansion of the Bottle Bill... Though the Bottle Bill is a state law, the city is not powerless to improve conditions in order to set the system and the workers who participate in it up for success. Beyond advocating for the state legislature to take action, the city can bolster the system in smaller ways. It could, for example, acknowledge the efficacy of the Bottle Bill by announcing through DSNY that beverage containers are more successfully diverted through deposit returns than the curbside mix ... We're not talking about reinventing the wheel—this system works, and works very well. It simply needs to be updated to a contemporary standard, and supported by its stakeholders. (Sure We Can)

Instead of just monitoring developments in Albany, I hope New York City's government will take active measures to support the Bottle Bill system which currently keeps several billion empty beverage containers out of our city streets, parks and landfill-bound garbage trucks each year, all the while supporting many thousands of marginalized New Yorkers. (Basinski)

While it waits for developments in Albany, there is much the city can currently do to support the redemption of bottles and cans under the Bottle Bill. The city could support the creation of additional redemption sites and centers. Sure We Can, the non-profit where I am on the board, recently opened a satellite redemption site on city-owned land, previously vacant, in East New York. After years of negotiations, with the active support of the local City Council member, we were

successful. There are many other sites the city could identify and make available, on a temporary or permanent basis, for beverage container redemption activities. (Basinski)

The city could support the thousands of informal-sector workers who make the Bottle Bill work. The money they earn, helping to collect our city's solid waste, is vital for their livelihoods. For example, many of these individuals dig through public trash receptacles for empty beverage containers. By designing our city's public trash bins with these individuals in mind—as many cities in Europe have done—the city would support marginalized workers while also reducing its own costs. [Commenter included a photo]. (Basinski)

In 2009, New York updated the Bottle Bill. As you know, bottled water was added in 2009. Thus, the deposit was added, raising it from zero to a nickel. In addition, the “handling fee” was added at 3.5 cents. We have not seen evidence that sales declined in New York, nor have we seen an impact on jobs. Have you seen any that you could share? (NYPIRG)

We feel comfortable in our position that expansion of the New York beverage container deposit system and an increase in the deposit from a nickel to a dime, will have no impact on sales—and thus should not have an impact on jobs. Arguably, the reverse is true. (NYPIRG)

The Bigger Better Bottle Bill (S5684/A6543) is another EPR bill which would reduce plastic waste by raising the return deposit from 5 cents to 10 cents. In Deposit Return Systems (DRS), increasing the deposit amount dramatically boosts recycling rates, as seen in Connecticut (up 21 points) and Oregon (reaching 86%). A 2025 report by Eunomia (attached) finds that expanding New York's current bottle bill could divert an additional 5.5 billion containers from landfill and save municipalities \$108 million each year. (Beyond Plastics Queens)

The old single use law about drink containers should be updated to include more items and the fee should be higher. Drink containers like sodas, all individual juices including juice boxes which are not a necessity for children's nutrition, and all carbonated beverages and water should have a higher fee to buy, at least 20 cents each. We want to discourage single use drinks in the first place, and if they are bought, that there is a strong likelihood that the containers will be recycled. (Ryan)

The bottle deposit of 5c hasn't risen for over 40 years. That means that participation in the system is not properly incentivized, resulting in a lower return rate and poorer recycling outcomes. It also means the tireless workers who pick up the bottles and cans that others throw away haven't gotten a raise in decades. Today in New York City, canners earn on average \$5/hour,¹⁰⁷ or less than a third of minimum wage... Marginalized canners are being further marginalized ... A 10c deposit would push our return rates, now at under 70%, up to 90%, as other states have seen. (Sure We Can)

The handling fee that supports redemption centers hasn't risen for 16 years, while the cost of operating a business has risen drastically. Redemption centers are closing every day because it's too expensive to operate—small businesses providing essential services are collapsing, and making the system at large harder to access for everyone ... The system has reached the brink of collapse. Redemption centers are disappearing, making it harder than ever to return materials ... [An expansion of the Bottle Bill] would mean more income for independent recyclers and more revenue for the state from unredeemed deposits. An increased handling fee would allow redemption centers to flourish instead of suffer, creating new access points and driving local economic activity. More

containers included would mean a drastic increase in the volume of material diverted from our landfills and waterways. (Sure We Can)

Many low-income New Yorkers, often within immigrant, elderly, or homeless communities, rely upon the practice of “canning” to supplement income. According to Sure We Can, an estimated 10,000 New Yorkers are part of the city’s canning community.¹⁰⁸ Increasing New York State’s deposit will bring new money to the canning community. A 10-cent deposit effectively gives a raise to professional redeemers (known as “canners”)—New York supports thousands of individuals¹⁰⁹ who rely on or supplement their income by collecting refundable cans and bottles for recycling. This segment of the population is often one of the most vulnerable, operating below the poverty line, and deposit refunds provide a lifeline. Canners have never received a raise given the 5-cent deposit has not changed since the law’s inception in 1983. (NYPIRG)

Increase the deposit from 5-cents to 10-cents and use revenues to support recycling equity. States with higher deposit fees have higher redemption rates than states with a five-cent fee. (NYPIRG)

Raising the deposit to a dime will both help curb the worsening problem of trash disposal in New York AND reduce litter in streets, parks, and waterways ... The state’s residential recycling rate has been dropping over the past decade. The state’s capacity to tackle this problem is dwindling. (NYPIRG)

The impact of the nickel deposit that was approved in 1982 has eroded over time. A mere inflation update would likely make that deposit nearly fifteen cents. (NYPIRG)

Increase the “handling fee.” The “handling fee” has not been increased in 16 years. This fee is the funding stream for redemption centers to handle redeemable containers. The cost of running a business have significantly increased over the past 16 years, but the handling fee has not. As a result, over 100 centers have closed, thus undermining the program, reducing consumer convenience, and costing the state jobs. Raising the handling fee would divert more redemption volume away from stores and towards redemption centers—when New York last increased the handling fee in 2009, the number of redemption centers increased from around 400 to over 1,000. NOW the opposite is happening. Redemption centers help divert high-volume redeemers from stores and provide a place for charities to return containers. (NYPIRG)

The city could provide financial incentives for the redemption of containers that are currently not covered under the state’s Bottle Bill. The town of North Adams Massachusetts recently began a pilot program to provide 5 cents to anyone who redeemed an empty “nip” bottle. These tiny liquor bottles, which have grown in popularity just as they have become a scourge of litter on our city streets and parks, will now be given a collection value in North Adams. The city could undertake similar efforts at minimal expense. (Basinski)

I got a text at 5:20 on Saturday morning from my friend Rex, who is a long-time canner in Brooklyn and the current elected treasurer of the Alliance ... he noticed flames shooting out from the windows above a bar ... Rex also texted me to let me know, since it’s a few blocks from my house and I know the owners of that bar ... Canners quietly and consistently do good work for this city. (Hegel)

Bottle and can redeemers are part of a green army, fighting an ongoing battle to hold beverage companies accountable for the waste they produce. This is a battle we should all be fighting together, because it’s not easy to go up against multinational corporations who have succeeded in

convincing us that convenient access to drinks in disposable packaging is a public good ... redemption rates are lower here than we see in other U.S. cities with container deposit EPR, which means that taxpayer dollars are being used to process these materials and corporations are being let off the hook. (Hegel)

Canners play a key role in helping New York achieve a 70% redemption rate for deposit-marked cans and bottles. They are stakeholders in solid waste management ... In aiming to increase community participation, the DSNY wisely acknowledges that they cannot reduce and manage the city's waste without the involvement of residents ... As such, this plan could be vastly improved by outlining more specific pathways to working directly with local residents, including canners, and non-profits. We advocate for community-based reuse, repair, redemption, and recycling centers because such programs support materials recovery and advance just transition and circular economy goals. This is happening in Portland, Oregon, where the city has contracted with and invested in community-based organizations to provide low-barrier work to those already working informally in the waste sector. This has made materials recovery and reuse more convenient for residents and improved the quality of the recycling stream. (Hegel)

Our redemption center, just in one part of Brooklyn, diverts approximately 1 million bottles and cans each month, and distributes hundreds of thousands of dollars annually in income into underserved communities. In a very basic way, this system makes our city cleaner and stronger. (Sure We Can)

Comment 183. Containerization and rat mitigation are a huge topic of concern, and rightfully so, yet we see fast-moving pilot programs with minimal stakeholder inclusion rolled out in our neighborhoods whose shared characteristic is the padlocks placed on containers to keep workers out. Independent recyclers are not rats! And if they are prevented from accessing recyclables, it impacts not only their and their families' livelihoods, but also the city's efficiency at diverting waste. (Sure We Can)

As DSNY moves containerization forward, it should also consider ... the people who remove cans from the waste stream and take them to redemption centers—provide a service that increases diversion from landfill, and they must not be locked out of the containers. (Reynoso)

Response 183. Strategy 65 is to monitor the effect of residential containerization on recycling capture rates and quality. Your suggestions will be taken into consideration and help inform the monitoring process.

Comment 184. Concerns raised by Some in The Labor Movement: While there is by no means universal opposition to modernizing the "Bottle Bill," (in fact some unions support), concerns have been raised that modernizing the law would lead to job loss. Those concerns are unfounded. There is no evidence available that shows that increasing the deposit will decrease beverage sales in the near or long-term. The think tanks Container Recycling Institute (CRI) and ReLoop Platform say they have found no definitive evidence that new or expanded beverage container Deposit Return Systems (DRS, or bottle bills) affect beverage sales, according to a study they recently published. The organizations say this result suggests that beverage industry concerns that DRS leading to sales declines are unfounded. (NYPIRG)

Response 184. As noted in the comment, the Bottle Bill is state legislation and implemented by the State Department of Finance. DSNY, in coordination with the Mayor's Office, monitors all state legislation related to sanitation and solid waste management and agrees that incentive programs, such as DRS, can increase diversion and recycling rates.

Comment 185. TOMRA supports DSNY adding the data derived from the ‘Bottle Bill’ program in New York City to its key performance metrics. In addition to volume recovered for recycling, we recommend surveying the number of redemption-collection points available to the public. Consider adding the study and measuring of LITTER as one of DSNY’s Performance Metrics. Litter is a constant concern made less so because of the Bottle Bill. Its value should be documented—and this program embraced by DSNY for the value it delivers unique to any other solid waste program. (TOMRA)

Response 185. Statewide Bottle Bill data is not maintained by DSNY. What information DSNY does obtain through voluntary reporting is included in the SWMP biennial reports.

Comment 186. TOMRA remains available as a local service provider and discussion partner for DSNY to better understand the potential impact modernizing New York’s ‘Bottle Bill’ might have on the City in terms of volume, litter, and commercial opportunity. Please consider speaking with other system experts like Eunomia, who in April of 2025 produced this analysis: *New York City Case Study – Expanded Bottle Bill Impact on Municipal Collections*. (TOMRA)

Response 186. DSNY appreciates this suggestion and will consider this under **Initiative 1.7**, to convene New York City’s circular economy stakeholders.

Packaging Reduction & Recycling Infrastructure Act (PRRIA)

Comment 187. Summary: SWMP26 should explicitly express support for the State Packaging Reduction and Recycling Infrastructure Act, which would reduce waste, support the circular economy, and potentially save and/or generate millions of dollars for New York City.

Response 187. SWMP26 includes **Strategy 62**, monitor progress on EPR policy for packaging in other jurisdictions and advocate for and advance EPR policy for packaging in accordance with *PlaNYC* and state legislative efforts. Your support for the NYS Packaging Reduction and Recycling Infrastructure Act is noted.

Detailed Comments

The Packaging Reduction & Recycling Infrastructure Act (S1464/A1749) passed the State Senate in both 2024 and 2025. In 2025, A1749 passed every committee in the State Assembly, but Speaker Heastie refused to put it on the floor for a vote. This 2026 session, A1749 does not need to go through committees again, but can be put directly on the floor for a vote. The urgent need to pass this legislation can be seen on every street in New York. What’s more, PRRIA (S1464/A1749) would not only help solve New York State’s growing solid waste crisis by reducing packaging waste by 30% over 12 years, it would also save New Yorkers a significant amount of money—an estimated \$1.3 billion over the next 10 years. [Commenter provided the] *Beyond Plastics’ Economic Benefits Report*.¹¹⁰ (Beyond Plastics Queens)

DSNY needs to put its muscle behind the Packaging Reduction and Recycling Infrastructure Act (PRRIA S146 / A1749). Passing PRRIA will reduce the amount of packaging waste that is collected and shipped to landfills and incinerators. According to *Beyond Plastics*, New York City will save \$818 million in the first ten years following passage of PRRIA. (Leonard).

Because 40% of the waste stream is composed of paper and plastic packaging, it's essential that we pass NY State's Packaging Reduction and Recycling Infrastructure Act (S.1464/A.1749). (350NYC)

Environmental and climate justice groups across New York State have been advocating for the Packaging Reduction and Recycling Infrastructure Act, which, if passed, would help accelerate reductions in solid waste and increase genuine diversion. The draft plan should clearly communicate to state and city policymakers the impact this act would have on helping New York City reduce the volume of solid waste, increase diversion, and reduce costs. (Cocco-Klein)

EPR for packaging: The Draft Plan is somewhat stronger on EPR for packaging than it is on the Bottle Bill, insofar as it commits DSNY to advocating for a New York EPR for packaging policy. However, this committal lacks specifics. We recommend DSNY consider amending the Draft Plan to clarify its needs and why it supports the Packaging Reduction and Recycling Infrastructure Act (PRRIA), introduced in 2025 as S1464/A1749. (TOMRA)

The Draft Plan likewise focuses on statewide EPR for packaging legislation as an opportunity to reduce single-use packaging waste. EPR for packaging can help reduce waste and prioritize reuse, but only if its implementing statute and regulations incorporate mandatory, rather than voluntary, packaging reduction, recycling, and reuse targets. Unfortunately, several U.S. states have rushed to pass flawed EPR for packaging laws that empower consumer brands and packaging manufacturers to continue producing packaging waste without requiring them to change their polluting practices.¹¹¹ During the last several legislative sessions, the New York State Legislature considered, but has not passed, a strong EPR for packaging law—the Packaging Reduction and Recycling Infrastructure Act (“PRRIA”), most recently introduced as S1464/A1749 in 2025. PRRIA would require a 50% reduction in packaging over the next twelve years and would limit toxic chemicals in packaging, among other key provisions. According to the Draft Plan, single-use packaging comprises more than 25% of the municipal solid waste stream in New York.¹¹² EPR for packaging legislation that mandates packaging reduction, recycling, and reuse will therefore go a long way toward reducing New York's waste by 85% by 2050. Just Zero urges DSNY to support PRRIA during the next legislative session and work with New York legislators to ensure that EPR for packaging in New York incorporates mandatory reductions in single-use packaging and the elimination of toxic chemicals from packaging. (Just Zero)

The draft plan talks a number of times about the importance of Extended Producer Responsibility (EPR) legislation, requiring manufacturers to contribute to the disposal costs of their products and packaging while creating incentives for them to choose recyclable material and reduce quantity. Right now there is a significant EPR piece of legislation in Albany that is facing pushback from lobbyists of big companies and the American Chemistry Council. NYC's Department of Sanitation's must use its influence to pass the bill into law. Called the Packaging Reduction and Recycling Infrastructure Act or PRRIA, the bill requires manufacturers to reduce their packaging, which will save the city money, and drive the transition to a circular economy that the plan draft says it is aiming for. (Leonard)

Commit to supporting working with City Council and State legislature to support legislation that reduces single use plastics, such as the NYS Packaging Reduction and Recycling Act (EPR) (S.1464 / A.1749). (CZWD)

We are hopeful that the NY legislature will soon pass the PRRIA Act, forcing the corporate plastic polluters to start reducing their packaging and start paying for the waste they have created over generations. (Herdan)

Add commitments to publicly endorse and work to enact the Glick-Harckham Packaging Reduction and Recycling Infrastructure Act pending in the New York State Legislature, which would cut plastic packaging waste and generate tens of millions of dollars a year for New York City recycling programs. (NRDC)

Other

Comment 188. The chart on page 115 shows that recycling violations have gone down while recycling is flatlining and declining. What are DSNY's plans for moving the needle on recycling, which has flatlined for years? Who will DSNY partner with to increase recycling? (Allen)

Response 188. *SWMP26* includes the Residential and Institutional Recycling Program to increase recycling, in addition to other initiatives and strategies throughout the eight *SWMP26* programs. DSNY will partner with other City agencies, community groups and elected leaders, and other stakeholders to increase recycling.

Comment 189. The city must create the structures to make it easy for residents to sort and dispose of things properly and conveniently ... For-profit companies are now marketing their services in NY; one can buy a subscription and mail all the items in color coded bags to their recycling reuse facilities in another state. Not landfill. (Feibusch)

Response 189. DSNY aims to make recycling more accessible for New Yorkers. *SWMP26* includes a number of strategies to improve and expand recycling programs, including collection and drop-off options.

Comment 190. Analyze collection schedules for trash, recycling and organics to reduce truck mileage and incentivize better diversion of recycling and organic waste. Currently buildings are penalized for better diversion as it requires more space to store for once/week collection. Once/week for organics is also very tough to manage ... Consider adjusting collection schedules also to reduce space taken up for containerization. (CZWD)

Response 190. DSNY continuously monitors collection routes for efficiency and agrees that containerization, although out of scope from *SWMP26*, provides an opportunity to evaluate many items related to collection operations, including frequency by material type.

Comment 191. The city with a new administration should set an example and require all agencies and buildings to provide model recycling programs in and around their buildings such as multi-stream recycling stations ... Can DSNY conduct a pilot to install multi-stream recycling stations throughout the city to improve recycling of street waste? (Allen)

Response 191. All New York City agencies are required to recycle metal, glass, plastic, paper, and cardboard. New York City public schools are additionally required to source separate organic material. DSNY provides resources to all city agencies on recycling plans, available at nyc.gov/agency-recycling.

Comment 192. DSNY acknowledged the need for developing partnerships when it said “DSNY will partner with City agencies to increase participation in the residential curbside collection program.” I would have hoped that many partnerships are already in place, but if not, they should be expedited (and not take 10 years to launch) ... details on these partnerships should be added to the plan with a list of agencies currently partnering and those that are projected to partner, along with details on how those partnerships are implemented, along with results ... (Allen)

Response 192. The overview section of *SWMP26 Chapter 4: Existing Administrative and Financial Structure* lists City agencies and identifies their relevant waste-related responsibilities. *SWMP26 Chapter 5* also includes a **Summary of Initiatives by City Agency**, which describes how DSNY and agencies will work together on implementing *SWMP26* initiatives. Additional details will be developed during *SWMP26* implementation.

Comment 193. Summary: DSNY’s diversion reportage is misleading, inflating residential diversion rates by including institutional waste tonnage.

Response 193. DSNY continues to refine the metrics used to monitor performance while simultaneously adjusting operations to maximize efficiency. As *SWMP26* is implemented, DSNY will continue to monitor tonnages, data sources, and performance through biennial reports. *SWMP26* contains many initiatives to increase residential participation and diversion through existing and planned curbside and containerized collection programs. *SWMP26* also includes **Strategy 44** (expand food rescue initiatives and improve data collection at New York City public schools). DSNY agrees with the commentor’s observations about reinforcing behavior and about what is needed to increase the capture and diversion rates.

NYCPS and NYCHA are publicly managed and serve large populations, in contrast to other residences, including single-family homes and buildings with fewer units than NYCHA developments. With the proposed strategies at NYCHA and NYCPS, the City intends to focus where it has greater potential for improvements and where a larger population can be reached and affected on a per-training and per-outreach event basis. It is accurate that material from schools and some NYCHA developments and other institutions can be collected on the same routes as other residential waste and recyclables. While DSNY is committed to data transparency and improvements to data collection, analysis, and reporting, DSNY will not determine waste collection routing based on data collection. DSNY will continue to report available data. **Table 7-7** of the *Draft SWMP26* showed wood separately from other organic material, following the structure of the DEC projections calculator. Wood is an organic material and can also be grouped with other organics or C&D depending on what is being reported. For example, the Staten Island Composting Facility accepts both food waste and tree debris (wood waste). DSNY is interested in waste reduction and diversion of all materials, including DSNY-supported textile diversion, and will continue to report on the results achieved through the variety of programming that contributes to reducing landfilling and incineration. DSNY’s methodology and what is included in the reported amounts and rates is clearly documented in the *SWMP26* chapters and biennial reports.

Detailed Comments

The higher diversion rate of 21.8 percent [in the DSNY FY2025 Annual Diversion Report] reflects the inclusion of additional diversion from a range of sources that do not involve DSNY collection. Independently organized bottle bill redemptions, donations, and e-waste recycling are also

included, even though these activities occur without DSNY involvement, except indirectly through the administration of the DonateNYC web platform ... DSNY's usual analytic rigor—possibly attributable to the abolishment of the Bureau of Recycling and Sustainability in 2022—has produced a similar pattern of accomplishment inflation. The newly added Mayor's Management Report (MMR) service goal, "Collect organic material and compost it," departs from the methodology used in DSNY's Annual Diversion Reports, as well as from the methodology used elsewhere in the MMR for recycling diversion reporting, to claim that FY2025 organics diversion reached 166,500 tons, described as "a historic high." ... DSNY's own FY2025 Annual Diversion Report shows that its curbside and containerized organics program—serving a largely residential customer base, but also including schools and other public institutions—diverted approximately 90,000 tons to anaerobic digestion and composting. Without clarification, DSNY used the MMR [Mayor's Management Report] to fold in non-curbside and non-containerized organics diversion and redistribution as part of its reported achievements. This aggregation is misleading. While there is nothing inappropriate about reporting additional diversion, there is a significant problem with obscuring performance in curbside and containerized capture and diversion—the core function from which the overwhelming majority of DSNY-managed disposal and diversion arises. Within the curbside and containerized stream, residential generation overwhelmingly dominates. This reality is often obscured in public discussions that emphasize schools, NYCHA, public-space recycling, or other city agencies and nonprofit generators. As visible and politically salient as these institutions may be, they are dwarfed by the scale of residential waste generation. (MacBride)

DSNY is careful never to state the size of school, NYCHA, or other institutional waste streams in its public reporting, in part because some collections from these sources are picked up on the same curbside and containerized routes that serve residential buildings, making tonnage differentiation difficult at the truck level. Independent estimates of the relative size of these streams are nonetheless possible (NYCHA Sustainability Agenda 2019–2025, DOE [NYCPS] Sustainability Management Plan (2022)) and consistently confirm that residential generation dominates by far. This has direct implications for future diversion gains. Large increases must come from improving residential curbside and containerized participation in DSNY's existing paper, MGP, and organics programs, and—if implemented—its planned curbside textile program. While additional institutional diversion is welcome and may reinforce residential behavior, no amount of school, NYCHA, or institutional diversion can compensate for low capture and diversion rates in the massive residential stream. (MacBride)

If the slippage already observed in reporting practices extends to padding diversion rates through the inclusion of activities such as Parks Department wood waste diversion, or NGO-organized textile, used goods, and food donation programs—as suggested by Table 7.7 on page 212 of the Plan—there is a serious risk that DSNY's most expensive and operationally complex programs, namely truck-based curbside and containerized collection, will continue to underperform without accountability, at large taxpayer expense ... (MacBride)

Requiring DSNY to squarely confront its own curbside and containerized diversion performance would necessarily force a reassessment of outreach and education strategies, in coordination with enforcement and with performance analytics that treat capture rates, diversion rates, and diverted tonnages as outcome variables. (MacBride)

- Comment 194.** The extent of material wasting is starkly illustrated by annual tonnages of paper, MGP, and organics that are collected as trash despite weekly collection, full acceptance infrastructure, and multimillion-dollar processing contracts already being in place. This loss occurs entirely due to residential under-participation, not because DSNY is mishandling properly separated materials. (MacBride)
- Response 194.** SWMP26 has a number of initiatives and strategies to improve participation, including **Initiative 3.4** (increase residential, agency, and institutional recycling participation and quality) and **Initiative 8.1** (work to increase diversion and reduce contamination in all recycling streams).
- Comment 195.** Track and publicly report Local Law 49 compliance metrics, including participation, contamination reduction, and diversion rates. (ICGT)
- Response 195.** LL49 of 2017 required collaboration between DSNY and NYCHA to review voluntary recycling incentive pilot programs to improve the diversion of designated recyclable materials in public housing. Findings from the review determined that voluntary recycling incentive programs are unlikely to significantly improve diversion of designated recyclable materials in public housing and suggested that the incentive pilot programs are less convenient than the existing NYCHA recycling program. To read the full review, visit:
<https://www.nyc.gov/assets/dsny/downloads/resources/reports/recycling-reports/local-law-49-nycha-recycling-incentives.pdf>
- Comment 196.** Each reform—the creation of OROE, the elevation and subsequent elimination of a deputy commissioner—was reactive, compensating for earlier neglect. Community-based organizations and nonprofit partners have demonstrated real capacity, credibility, and cost-effectiveness as outreach contractors, but their institutional reach is limited. Zero Waste advocates, City Council staff, and former City employees widely recognize the deeper structural problem: core public responsibilities for waste minimization were never adequately resourced or integrated into DSNY’s central operations. As a result, DSNY’s institutional structure, culture, and funding priorities have not moved residential diversion meaningfully beyond the 50 percent capture threshold. Periodic increases in residential recycling enforcement, as shown above, have likewise failed to produce durable gains in capture or diversion. (MacBride)
- Response 196.** As part of SWMP26 implementation, DSNY will coordinate with community groups and community partners on a number of strategies to increase the amount of material diverted from disposal, including outreach and education strategies and community-based solutions.

Residential and Institutional Municipal Solid Waste (MSW) Program

Incineration

- Comment 197. Summary:** DSNY should phase out (downsize and ultimately end) its contracts with incinerators outside of New York City, including the Reworld Essex incinerator.
- Response 197.** SWMP26 **Strategy 69** is to prioritize planning for the expiration of the contracted capacity at the Reworld Essex, New Jersey incinerator while also evaluating options for other disposal contracts,

starting with the contracts that would expire first. DSNY will collaborate with multiple stakeholders as part of that strategy. *SWMP26* also includes strategies for waste prevention, diversion, and material recovery to reduce reliance on incineration and landfilling overall.

DSNY notes the comments that request a phase down and/or phase out of waste export to Reworld Essex, motivated by concerns about the health and environmental impact of the Reworld Essex incinerator. These comments will help inform DSNY's continued participation in the development of the citywide *EJNYC Plan* and annual progress reporting (**Strategy 79**), and the consideration of the distribution of environmental justice benefits as part of *SWMP26* program implementation (**Strategy 80**). At the same time, DSNY has a responsibility to secure reliable disposal capacity for its managed waste and, given the limited options available in the market, must think carefully before categorically excluding any specific alternative. Further, DSNY works with vendors on compliance, recognizing that not all violations are equal in severity and prioritizing those that are most concerning.

DSNY is also transitioning its collection and department vehicle fleet to electric by 2040 in accordance with Executive Order 53 (2020). In the fall of 2022, the Department of Citywide Administration Services (DCAS) released the Clean Fleet Transition Plan.¹¹³ DSNY will continue to participate in the research and development of new technologies and to evaluate the mechanical reliability and operability of alternative fuel collection trucks to assess their respective environmental and economic performances. DSNY will also continue to assess its facilities, build EV infrastructure, and work with DCAS and local utilities to receive the necessary funding and service level upgrades to support this major endeavor.

Detailed Comments

In Newark, the community is already burdened by a plethora of environmental and correlating health risks. I'm writing to ask that NYC divert as much waste as possible, in order not to rely so heavily on polluters outside of NYC, like incinerators ... The Department of Sanitation has a crucial opportunity to redirect the trajectory of how waste in NYC is handled, as well as the impact on communities of the health and environmental risks associated with such handling. Everyone deserves unimpeded access to clean air, regardless of what side of the Hudson they reside on. (Tauer)

Sending waste to the Reworld Essex Incinerator is Environmental Injustice ... The facility to which Manhattan sends its waste is compounding the health and environmental impacts of the Ironbound population. According to the NJ Department of Environmental Protection's Environmental Justice Mapping, Assessment, and Protection Tool¹¹⁴ (EJMAP), the incinerator contributes to key stressors: non-cancer health risks from air toxics, heavy-duty truck traffic, and soil contamination. The EJMAP notes a combined hazard quotient (HQ) of 0.8 for Ironbound residents, meaning they are exposed to about 80% of the "safe" limit for non-cancer-causing air toxics. These odorous emission-exceeding pollutants can affect the lungs, immune, nervous, and reproductive systems, as well as major organs like the heart, liver, and kidneys. (ICC)

When the incinerator burns trash, highly toxic chemicals like dioxins are formed in the combustion process¹¹⁵ and immediately released into the air that Newarkers breathe. That means that when Reworld Essex burns NYC's trash, the lives of Ironbound pay the consequences. Manhattan sends 100% of its waste to incineration, 66% of which goes to Reworld Essex.¹¹⁶ That is environmental

injustice. The Ironbound community should not be burdened with others' waste, much less 66% of it! (ICC)

Not only is this incredibly risky and harmful to Newark residents, but it also can open the floodgates for more flaws without reform of how NYC waste is managed ... As we take advantage of the clean air and misplace items that can be recycled or composted, not only is NYC harming another community, but those pollution problems will increasingly become our own over time. (Taufer)

Newark is one of the most overpolluted and impoverished neighborhoods in New Jersey. Newark is surrounded by the airport, highways, rail lines, the Passaic River, one of the country's most polluted waterways, active and abandoned industrial facilities, close flight paths, active truck routes, and New Jersey's largest garbage incinerator: Reworld. (Encarnación)

The incinerator is one of the biggest polluters in New Jersey. When the incinerator burns trash, highly toxic chemicals like dioxins are formed in the combustion process and immediately released into the air that Newarkers breathe. (Encarnación) (Taufer)

Here in the Ironbound, we live with intense air pollution every day. The Ironbound is one of the most overpolluted and impoverished neighborhoods in New Jersey. Ironbound neighbors face severe health stressors because of their proximity to the largest wastewater treatment plant on the East Coast, hazardous waste facilities, warehouses, the Port Newark-Elizabeth Marine Terminal, Newark Liberty International Airport, over 100 brownfield sites,¹¹⁷ and the Passaic River, which is the longest Superfund site¹¹⁸ in the country. This pollution has real consequences: our community members experience higher rates of asthma and elevated health risks, reflecting the detrimental impact of poor air quality and other environmental hazards. Adding to the cumulative impacts of these polluting sites is New Jersey's largest garbage incinerator: Reworld Essex, mere yards away from residential homes. This incinerator is one of the biggest polluters in New Jersey.¹¹⁹ (ICC)

For example, compared to other NJ major facilities with air permits, Reworld Essex is the #2 emitter of arsenic, hydrogen chloride, mercury, and nitrogen oxides, #3 emitter of beryllium, #4 emitter of carbon tetrachloride, #5 emitter of lead and sulfur dioxide, and #6 emitter of carbon monoxide.¹²⁰ (ICC) (Encarnación) (Taufer)

The Reworld Essex incinerator is a bad actor. (ICC)

[Reworld Essex] has had over 800 air permit violations since 2005.^{Error! Bookmark not defined.} The most egregious violation was recent. In 2019, the incinerator burned unauthorized medical waste,¹²¹ resulting in pink and purple smoke. (ICC) (Encarnación) (Taufer) I am deeply concerned about the amount of waste NYC sends to the Reworld Essex incinerator in Newark, NJ. The Newark community is already overburdened with environmental and health risks. Instead, NYC must divert as much waste as possible so that less refuse is sent to polluting facilities like incinerators outside of NYC. (Encarnación)

SWMP26 states that the DSNY has contracted 531,600 tons of waste annually with Reworld Essex until September 2032. The average annual tons from 2016 to 2023 were 379,326. Not only should that number remain lower than the contracted amount, but the DSNY must actively downsize and, rather than renew the contract with Reworld Essex in 2033, the DSNY must completely end it ... ICC tasks the DSNY with transforming NYC's waste management system to make it a little easier for Newark to breathe. (ICC)

The [Reworld Essex] Incinerator generates constant truck traffic from waste deliveries and ash hauling. These diesel trucks release harmful exhaust, adding to asthma, lung disease, and heart problems in nearby residents. Communities close to Reworld already carry one of the highest truck traffic burdens in Newark because of the chemical corridors. Trucks transporting trash from Manhattan to the Ironbound amount to about 16,000 trucks annually¹²² alone. The incinerator also produces toxic ash and byproducts that can contaminate soil over time, which is dangerous because pollutants can seep into yards, playgrounds, and gardens, exposing families and children directly. (ICC)

I am deeply concerned about the egregious amount of waste New York City sends to the Reworld Essex Incinerator in Newark, NJ. This practice exacerbates already significant environmental and public health risks in Newark, creating an unsafe and unjust burden for the community. NYC must work to divert as much waste as possible so that less refuse ends up in polluting facilities outside the city. The Department of Sanitation now has a real opportunity to cut waste and reduce what is sent to Reworld Essex. This is a crucial moment to rethink the city's waste management system and center environmental justice in that process. Every community deserves clean air and accountability, regardless of the side of the Hudson River they call home. (Roemer)

Add commitments to phase-down the shipment of waste to the problem-plagued ReWorld Essex County incinerator in Newark, NJ and pledge not to renew that contract when it expires in 2032 (NRDC)

The 2026 SWMP must commit the Department of Sanitation to reviewing, downsizing, and ultimately ending its contracts with incinerators outside of NYC. The contract with facilities in Reworld Essex expires in 2033, which provides NYC with six years to plan for expanded waste prevention, recycling, composting, and other alternatives to exporting municipal waste to overburdened environmental justice communities. (Encarnación) (ICC)

The City should commit to downsizing and ultimately ending contracts with “waste to energy” facilities outside of the City such as in Essex County which further imposes environmental harm on other overburdened environmental justice communities. (NYC EJA)

ICC emphatically implores the SWMP26 to commit the DSNY to downsize and ultimately end its contracts with incinerators outside New York City, such as Reworld Essex in the Ironbound, Newark. (ICC)

The Draft 2026 plan should outline a clear, time-bound phase-out of incineration as a disposal method and include a timetable with bi-annual benchmarks for measuring progress in achieving these reductions. In planning for the end of ReWorld's contract, DSNY must review, downsize and ultimately end its contract with waste to energy facilities outside of the City while planning for waste prevention and reduction, recycling, composting and other alternatives to exporting waste to overburdened environmental justice communities. These transition strategies should also be aligned with labor, community and climate priorities. (TDT)

Comment 198. Summary: New York City waste should not be sent to incinerators outside of the city [or incinerators in general], including the Reworld facilities in Newark, New Jersey and Chester, Pennsylvania, due to the impact on environmental justice communities.

Response 198. DSNY acknowledges and appreciates these comments that express opposition to sending New York City waste to incinerators, especially those out of state, out of concern about the health and environmental impacts to residents in environmental justice communities near incinerator facilities. Your suggestions will help inform DSNY's continued participation in the development of the citywide *EJNYC Plan* and annual progress reporting (**Strategy 79**), the consideration of the distribution of environmental justice benefits as part of *SWMP26* program implementation (**Strategy 80**), and DSNY's planning process for meeting overall waste management capacity.

SWMP26 also includes strategies for waste diversion (through waste prevention, material reuse, and material recovery) which will reduce the need for incineration (and landfilling). DSNY encourages New Yorkers to fully participate in DSNY's programming, which provides diversion options for up to 75% of the waste stream.

Regarding Lifecycle Assessments (LCA's), DSNY's practice is to consult available industry resources including white papers and academic studies to inform our understanding and decision making related to various technologies available for solid waste management; however, DSNY does not independently conduct LCAs.

Detailed Comments

DSNY must ... explore alternatives to exporting NYC's waste to overburdened environmental justice communities like the Ironbound ... the New York City Department of Sanitation has an opportunity to transform NYC's waste management and prioritize environmental justice. With the *SWMP26*, the DSNY can reduce waste, minimize the amount that goes to incinerators like Reworld Essex in Newark, and phase out the use of incinerators to dispose of waste. All communities deserve clean air and accountability, regardless of what side of the Hudson River they live on ... With the *SWMP26*, the DSNY can reduce waste, minimize the amount that goes to incinerators like Reworld Essex in Newark, and phase out the use of incinerators to dispose of waste. All communities deserve clean air and accountability, regardless of what side of the Hudson River they live on. (ICC)

In 1951, NYC law required new apartment buildings over 3 stories to have on-site incinerators. These incinerators often lacked pollution controls, these incinerators were closed in the 70's. The last city incinerator was closed in the 90's, ending NYC incineration. NYC has been shipping trash to the Covanta/Reworld facility (which I will call Covanta) since the early 90's. Incineration is the most toxic and expensive way to deal with solid waste. I am tired of my neighbors in Chester City, PA, dying early from cancer and respiratory diseases, worsened by the largest incinerator in the country, which Brooklyn, and Queens still ship trash to be burnt. By shipping trash 2 hours away, to be burnt, you are allowing the region to be polluted and poisoned, including NYC, when the winds blow Northeast from Chester City, PA to NYC. It's time for NYC to prevent the incineration of NYC trash, to save money, and save lives. (Kronheim)

Incineration is not renewable. It depends on burning garbage, putting 70 percent of its toxic waste in the air as pollutants, that damage human health and greenhouse gases; leaving behind toxic ash, for landfills. Delaware County, PA had a study done that found it would be cheaper to put our trash in a landfill than to have Covanta burn it and for us to fill our landfills with toxic ash left over from burning trash. There would also be an improvement in health for Delaware County, as well as a reduction in medical bills for health care. The savings involved were over \$350 million dollars. Given that, NYC and New York State have eliminated incineration locally, along with greatly

reducing methane from fracking. It's time that NYC stop all plans to allow trash to be shipped outside of New York for incineration...otherwise New York is hypocritically forcing upon others the plagues that New York is unwilling to burden on themselves. The Covanta incinerator gets most of the trash to burn from New York City, Philadelphia and Delaware County, PA. Philadelphia has a bill called Stop Trashing Our Air Act, which would prohibit trash vendors from taking trash to be incinerated. Delaware County is converting its landfills that take in toxic ash from Covanta, so that they can use those landfills directly for trash, saving money, and polluting less. We ask NYC to do its part so that we can all breathe cleaner air. (Kronheim)

The Covanta Reworld Incinerator leads in Delaware County, as the number one polluter in nitrogen oxides, carbon monoxide, and mercury. It is number 2 on releases of lead, fine particulate matter (PM_{2.5}), sulfur dioxide, cadmium, chromium, and arsenic, which are all known carcinogens ... VOCs (volatile organic compounds) ... are all contributors to climate destruction. We know of the human destruction. Over 27% of our children have asthma. We have a high infant mortality and low birth weight baby rates, cancer rates higher than the national average. For example, liver and bile cancers are 91% higher than the national average. Laryngeal cancer, 84% higher. Hodgkin's lymphoma, 78% higher. Pancreatic cancer, 50% higher. All higher than the national average, and it goes on and on and on. Recently, CRCQL lost a member, Mr. Joshua Shockley, he was 38 years old. He died from a rare form of cancer. The day of his first chemotherapy was the day that his son was born. His son was 5 months old, and he died. And he's gone forever. (CRCQL, Mayfield)

I'm with the Chester Residents Concerned for Quality of Living. We've been leading the environmental justice movement in Chester for the past 33, going on 34 years this year, and I also serve as the youth coordinator for our environmental justice group called Choices for students ages 8 to 18. And some of the things I've noticed in terms of the amount of trash that comes from NYC to Chester absolutely impacts the health of our students ... one of our ninth grade students, that's involved with Choices says, "The incinerator and the trash that's sent here impacts me because I have asthma and the pollution of the particulate matter, the soot, can penetrate my lungs and impact me." As you think about the draft plan, I ask that you think about all of the students of Choices ... and myself. Believe me, I'm trying to stay in shape and smelling trash that smells like trash can juice burnt every day – not a good feeling. (CRCQL, Fontaine)

Chester has become the dumping ground for the region, and is home to the largest trash incinerator in the United States, which burns around 3,500 tons of trash per day. This 33-year-old incinerator is the largest in the United States and has the least amount of pollution controls. Approximately 20% of the trash burned is from New York City. In 2023, NYC sent 195,419 tons of trash to be burned in Chester. Over 147,394 tons of trash came from Queens. CRCQL is gravely disappointed by the DSNY's plan to continue things as is for the next 10 years with continuing the use of incineration as a disposal method. Right now NYC is complicit in contributing to the environmental racism occurring in the city of Chester. The incinerator has wreaked havoc on the health and wellbeing of residents in Chester City and the region, leading to childhood asthma rates 5x the national average and cancer rates far beyond the national average. We also know that incineration is by far the worst way to manage waste. When trash is burned 70% becomes air pollution and 30% is toxic ash. Toxic ash from Reworld is hauled to Delaware County's landfill and contributes to 55% of the total waste sent to the landfill, roughly 11% from NYC. Life cycle analysis in the Zero Waste Plan¹²³ report published by Delaware County confirms that: Reworld Delaware Valley's human health and environmental costs total \$337/ton burned, compared to \$144/ton for

directly using Rolling Hills Landfill ... Reworld's human health costs are 23 times higher than those of Rolling Hills Landfill. CRCQL is currently working with the City of Philadelphia and Delaware County to phase out the incinerator, and we are asking NYC to STOP sending their trash to Chester. There must be a plan in place to phase out incineration and increase waste diversion and reduction in the NYC Department of Sanitation's 10-year waste plan. (CRCQL, Burman)

Chester Residents Concerned for Quality Living (CRCQL) was formed in 1992 as a direct result of what we were told was a trash-to-steam plant being built and beginning its operations in 1991. We quickly learned that in actuality, it [Reworld Delaware Valley] was nothing more than an incinerator ... We are a very densely populated community ... In Chester, 70% of our residents are African Americans, and the median income is roughly about \$39,000. In 1995, Dr. Charles Lee, United Church of Christ labeled Chester as one of the worst cases of environmental racism that he had ever seen ... I am a representative of our community, and I can tell you that our community is suffering. People are dying from cancer, all types of cancer. People are dying and are being impacted with diabetes, cardiovascular disease, heart disease, and other just nuisance issues. Every single day, we are environmentally assaulted. And if I were to assault somebody physically, they would have the ability to go and file and press charges against me, and I would be held accountable for my actions. [With] this incinerator, no one is ever charged with the damage that they have done to our community ... We are asking for a little help from New York and to convince our legislators to put the proper ordinances or laws and fines and education in place, where we're not literally killing ourselves. Our children deserve the fight that we have for this. They deserve to have the ability to breathe. And right now, every day, we are losing the ability to breathe in our Chester community. (CRCQL, Mayfield)

Much of Chester, some 3.9 miles, sits on waterfront on the Delaware River ... Additionally, the Covanta Reworld Incinerator is located on the waterfront in Chester. It has become a real impediment to true economic development of our waterfront for our city. They have caused a devaluation of properties and lowered the quality of life in our community. People no longer sit on their porches, no longer have barbecues, or are embarrassed to have company come over due to the stench coming from the incinerator. The community surrounding the incinerator went from an 81% owner-occupied housing rate and it is now below 40% owner-occupied. Our community has been transformed into majority rental units. Many homeowners basically walked away from their properties that you could not sell or rent. I was one of those homeowners, and my old house still sits empty. (CRCQL, Mayfield)

We are asking for New York to be a good neighbor and approve the *Draft 2026 Solid Waste Plan* to stop the amount of trash. Some of the things I noticed in terms of the statistics, 12% of Manhattan's refuse is sent to Chester. 21% of Queens refuse is sent to Chester and about 200,000 tons of all trash from NYC comes directly about five blocks from where I go running ... Thank you and think about the Chester Residents Concerned for Quality of Living when approving this draft plan. (CRCQL, Fontaine)

TDT is concerned that the SWMP maintains the City's reliance on incineration, including the long-standing use of the Reworld (formerly known as Covanta) facility in Newark, New Jersey. The draft plan only acknowledges the end of Reworld's contract in 2032 and the need to evaluate facility capacity and other options to replace this contract. Incineration is incompatible with New York City's climate, public health, and environmental justice commitments and continuing to rely on these facilities contracts the goals under the Climate Leadership and Community Protection Act

(CLCPA of 2019) and the City's environmental justice obligations. Incinerators are major sources of localized pollution including heavy metals, dioxins and greenhouse gas emissions and many are located in Black and Brown communities. This is the case for the Reworld facility which is located in Essex County, imposing environmental and health burdens on the Ironbound community neighborhood. (TDT)

Key to our SWMP should be a substantial reduction in the amount of material that is sent to landfill and incinerator for environmental and financial benefit. NYC Local Law 39 of 1989 banned privately-owned waste incinerators and required all to cease operations. While we no longer burn garbage in NYC, 100% of Manhattan's "trash" is burned in Newark. Studies show that they release hazardous dioxins, heavy metals and particulate matter into the air, affecting the health of Newark citizens and other communities in New Jersey and Pennsylvania ... already suffering from environmental injustices. This trash contains mixed, toxic material and unrecoverable or unrecyclable plastic. We NYC citizens don't want to poison our neighbors. I urge DSNY to investigate the true health effects of these plants. (E. Cooper)

In Pennsylvania, the Covanta Reworld [Reworld Delaware Valley], by statute, must have a community host agreement and pays community host fees to the City of Chester. They were paying \$2.50 a ton to Chester, resulting in about \$45 million to the general budget. Then, magically, in 2017, the former mayor Kirkland signed a secret contract with Covanta, lowering that fee to \$2 a ton, resulting in a loss of revenue of about \$14 million. There's been no explanation why the fee was lowered, or why it was done in secrecy. (CRCQL, Mayfield)

Covanta Reworld is an outdated facility. In terms of its pollution control technology, it was built over 33 years ago. It lacks modern pollution control technology. The plant will say that they operate within its permit limits. We say that they are grandfathered in and would not be able to meet today's clean air quality standards. (CRCQL, Mayfield)

Delaware and Philadelphia County, and the region of which Chester sits in, are in what is called the non-attainment area of the Clean Air Act standard for ground-level ozone, meaning that our air quality is consistently unhealthy to breathe. In 2024, the American Lung Association issued its State of the Air Report and gave Delco a failing grade for annual particulate pollution, environmental exposures to particulate matter 2.5, toxic air emissions, and diesel particulate matter. Chester also falls within the 90th percentile for ozone, meaning it is in the top 10% in the state for ground-level ozone exposure, which is known to cause respiratory distress, among other health problems. The facility is a major stationary source for greenhouse gas emissions, resulting in climate degradation. (CRCQL, Mayfield)

You may have heard that using trains instead of trucks for waste export "gets trucks off the road." However, the use of trains instead of trucks does not reduce local truck traffic going to and from waste transfer stations to drop off waste. Every community that hosts a transfer station has this local truck traffic regardless of the transportation mode used to export the waste from the city. The use of trains also does not reduce trucks at some disposal facilities, for example, the Reworld incinerator in Chester, PA. 800 to 1,000 trucks a day dump waste at the Reworld incinerator. The waste includes organics and plastics thrown into black bag trash in Manhattan. The majority of Manhattan's waste is exported by rail from New York before being transferred to trucks that dump it at the Reworld incinerator in Chester, PA. (CURES)

[Reworld Delaware Valley] is the largest incinerator in the nation, burning 3,550 tons of trash per day ... New York sends about 27% to 29% of its volume, 375,000 tons ... Incidentally, the City of Chester only contributes about 1.8% of the waste that is burned ... By way of rail, it goes to Delaware, and then it's loaded onto trucks, and trucked throughout our community ... Resulting in about 500 to 800 trucks per day ... Divert your trash from incineration and stop sending trash to Chester. (CRCQL, Mayfield)

In Newark, the community is already burdened by a plethora of environmental and correlating health risks. I'm writing to ask that NYC divert as much waste as possible, in order not to rely so heavily on polluters outside of NYC, like incinerators ... The Department of Sanitation has a crucial opportunity to redirect the trajectory of how waste in NYC is handled, as well as the impact on communities of the health and environmental risks associated with such handling. Everyone deserves unimpeded access to clean air, regardless of what side of the Hudson they reside on. (Taufel)

CRCQL was able to convince the Delaware County Solid Waste Authority to conduct a life cycle analysis of trash that is sent to be burned. Some of the findings concluded that incineration in the City of Chester has led to \$193 million more in human health and environmental costs per ton of waste disposed than that of directly landfilling it in the landfill. When looking at human health costs alone, incineration was 23 times worse than landfilling. The transportation impacts of landfilling in Berks, rather than using the in-county incinerator, were insignificant compared to other health and environmental impacts and did not, therefore, justify choosing incineration ... Have your community conduct a life cycle analysis of waste incineration versus landfilling. It will determine that landfilling is cheaper and less polluting than incineration. (CRCQL, Mayfield)

Comment 199. From an environmental justice perspective, exporting waste simply shifts impacts to other communities, often with fewer protections. Modern waste-to-energy facilities operate under some of the most stringent air permitting and monitoring requirements in the industrial sector. Managing waste locally under strong regulation is more responsible than pretending exported waste disappears. (NYSWTEC)

Response 199. Comment noted.

Comment 200. According to Chapter 5 of the Residential Municipal Solid Waste program outlined by *SWMP26*, “the contract with the Reworld waste-to-energy facility in Essex will expire in the Fall of 2032, and there are no renewal options.” Even though this plant is responsible for the processing of an average of 379,326 tons of refuse per year alone (more than 12% of DSNY-managed refuse), there was no specified plan for the re-allocation of this capacity nor of a lower carbon disposal pathway alternative. Our analysis finds that continued use of the Essex waste-to-energy facility is currently the least CO₂-intensive disposal option available to DSNY for managing residual municipal solid waste. (CCNY EEC)

Some modest reductions in transportation-related GHG emissions may be achieved by routing Essex-bound tons through transfer stations, but regardless of transfer station used, Essex's proximity renders it the most attractive option for managing NYC's waste that is unsuitable for recycle or compost ... Routing Essex-bound tons through the nearest available transfer stations results in a 24% net reduction in lifecycle transportation-related GHG emissions relative to current

disposal strategy (sending collection vehicles to Essex). By contrast ... diverting these same tons to more distant waste-to-energy facilities—via transfer stations currently used for long-haul export results in a substantial increase in transportation-related GHG emissions. (CCNY EEC)

Response 200. DSNY is prioritizing planning for the expiration of the contracted capacity at the Reworld Essex, New Jersey, incinerator while also evaluating other options for other disposal contracts (**Strategy 69**). As part of future procurement, GHG emissions will be considered among other factors, such as air quality, the effects on neighboring communities, available capacity, projected need for disposal, and costs. Prior contracts were subject to environmental review, and future environmental review documentation would disclose the projected GHG emissions. To further consider climate change, DSNY will also review the status of each facility that is owned or under contract with DSNY for the management of solid waste, in accordance with the City's *Climate Resiliency Design Guidelines* (**Strategy 72**).

Comment 201. Summary: Commenters support the inclusion of waste-to-energy (WTE) as a NYC waste management strategy, for reasons including, but not limited to, the following:

- Energy recovery (greater than from landfill gas-to-energy systems)
- GHG emission reduction/fossil energy displacement
- Waste management cost reduction
- Waste volume reduction
- Decreased reliance on landfills, which have limited capacity
- Post-combustion material recovery (e.g., metals) reducing costs, GHG emissions, and supporting circular economy goals
- Increasing regulatory certainty, encouraging reinvestment in existing facilities, and supporting long-term system reliability
- Secure destruction of controlled substances
- Destruction of complex organic compounds such as PAHs, VOCs, and PFAS

Response 201. DSNY notes the support for the use of waste-to-energy technology for managing New York City's municipal solid waste expressed in these comments. DSNY will continue to monitor the field of thermal treatment technologies through market and technology research, attendance at industry conferences, and attention to state and federal policy development, reporting on updated findings in SWMP biennial reports (**Strategy 78**). *SWMP26* includes strategies to reduce waste generation (through prevention, material reuse, and material recovery) and increase diversion thereby reducing incineration and landfilling. The implementation of *SWMP26* is expected to result in a projected 30.5% diversion rate for DSNY-managed municipal solid waste and 54.7% diversion rate for New York City commercial waste as described in **Chapter 7** of *SWMP26*.

Detailed Comments

WTE also serves critical public safety functions. WTE's high-temperature process is specifically designed to destroy complex organic molecules, resulting in effective destruction of pharmaceuticals, illegal drugs, and even PFAS. It is the only technology that reliably satisfies U.S.

Drug Enforcement Administration (“DEA”) guidance for the secure destruction of high-security waste streams, including excess pharmaceuticals, illegal drugs, counterfeit goods, and other contraband. In other words, WTE facilities keep fentanyl, counterfeit goods, and dangerous contraband off our streets. NYC utilizes these abilities with Reworld to ensure weapons and other contraband is removed safely from the streets. (Reworld)

Waste-to-energy is not a fringe technology. It is a long-recognized, heavily regulated solid waste management tool that treats post-recycled residual waste—the material that remains after reduction, reuse, recycling, and composting. If it is not managed through waste-to-energy, it goes to a landfill. There is no third option ... waste-to-energy does not compete with recycling; it manages what remains. If this Plan is serious about landfill diversion, climate impacts, and system resilience, waste-to-energy must be included. (NYSWTEC)

The waste hierarchy is explicit: energy recovery comes before landfilling. Excluding waste-to-energy while continuing to rely on landfills contradicts the hierarchy and locks the system into the most environmentally damaging outcome ... Waste-to-energy also preserves landfill capacity, reduces waste export, and provides reliable local energy. At a time of grid congestion and increasing electrification, ignoring dispatchable, in-state generation is a planning failure—not a climate strategy. (NYSWTEC)

Excluding waste-to-energy creates regulatory uncertainty, discourages reinvestment in existing facilities, and undermines long-term system reliability. Solid waste master plans are supposed to ensure capacity, stability, and environmental protection—not ideology. (NYSWTEC)

We agree with DSNY’s conclusion that Waste-to-Energy (WTE) facilities remain an essential component of an environmentally responsible and resilient waste management system, consistent with New York State’s Solid Waste Management Plan and global waste-management standards. (WTEA)

After recycling and composting, municipal solid waste in the United States is managed in one of two ways: disposal in landfills or processing at WTE facilities. In addition to generating energy, WTE reduces the volume of waste requiring disposal in landfills by up to 90 percent, extending landfill lifespans and reducing the need for new landfill capacity. WTE facilities also recover ferrous and non-ferrous metals from post-combustion ash, enabling recycling of materials that would otherwise be permanently buried in landfills, including metals critical to domestic supply chains. (WTEA)

WTE is widely recognized as a tool for greenhouse gas mitigation, even after accounting for stack emissions. Climate benefits occur through three primary mechanisms: diversion of waste from landfills, where organic material generates methane, even when landfill gas collection systems are in place; displacement of electricity that would otherwise be produced by fossil-fuel generation; and recovery and recycling of metals, which avoids the energy use and emissions associated with virgin material extraction and processing. These benefits are recognized by the U.S. Environmental Protection Agency, the Intergovernmental Panel on Climate Change (IPCC), the European Union, California environmental agencies, and multiple academic institutions. Diversion technologies such as WTE play an important role in mitigating anthropogenic methane emissions. (WTEA)

[WTE facilities] are the only technology that reliably meets U.S. Drug Enforcement Administration guidance for secure destruction of controlled substances, including excess pharmaceuticals, illegal

drugs, counterfeit goods, and other contraband. Municipalities across the country utilize WTE facilities to ensure these materials are permanently destroyed and do not re-enter the marketplace or communities. WTE facilities are also designed to destroy complex organic compounds, including PAHs, VOCs, and PFAS, through high-temperature combustion and boiler design, offering environmental protections not achievable through landfilling. (WTEA) (Goodwill)

Waste-to-Energy (WTE) is a proven technology that safely converts post-recycled MSW—which would otherwise be landfilled—into reliable baseload energy. After recycling and composting, MSW in the United States is managed in one of two ways: it is either disposed of in a landfill or processed at a WTE facility. WTE plants use advanced combustion systems and state-of-the-art emission controls to generate electricity and/or steam. (Reworld)

In addition to generating domestic baseload power, WTE reduces the volume of waste going to landfills by up to 90%, thereby extending landfill operational lifespans, mitigating methane generation from anaerobic decomposition in landfills, recycling ferrous and non-ferrous metals and enabling recovery of other critical materials from the post-combustion ash—vital strategic materials that would otherwise be permanently sequestered in landfills. WTE facilities, and others like them around the world, are widely recognized as a source of GHG mitigation. (Reworld)

[WTE facilities] reduce GHG emissions, even after consideration of stack emissions from combustion by: Diverting post-recycled solid waste from landfills, where it would emit the potent GHG methane for decades, even when factoring in landfill gas collection. The most significant climate benefit of WTE is driven by its ability to completely avoid landfill methane emissions. Methane is an extremely powerful GHG. It is over 80 times more potent than carbon dioxide (CO₂) when measured over a 20-year timeframe. The Executive Director of United Nations Environment Programme ("UNEP"), called reducing methane emissions, "the strongest lever we have to slow climate change over the next 25 years." Landfills are a significant source of anthropogenic methane emissions—the third largest after agriculture and the oil and natural gas industry. (Reworld) (USCEC)

[WTE facilities] reduce GHG emissions, even after consideration of stack emission from combustion by generating energy that otherwise would have been produced by GHG-emitting fossil fuel power plants. (Reworld) (USCEC)

[WTE facilities] reduce GHG emissions, even after consideration of stack emission from combustion by recovering metals for recycling, thereby avoiding GHG emissions and the use of energy associated with the production of products and materials from virgin inputs. (Reworld) (USCEC)

For over 10 years, Reworld has partnered with DSNY for the disposal of municipal solid waste ("MSW") in Queens and Manhattan. In 2024 alone, Reworld managed over 950,000 tons of waste collected by DSNY through the North Shore and East 91st Street Marine Transfer Stations ("MTS"s) as well as directly to our Essex County facility in Newark, NJ. By recovering energy and metals from DSNY's waste instead of landfilling, we have turned a significant portion of New York City's waste remaining after recycling into a resource: generating 1.3 billion pounds of steam for industry, including a 100% recycled paper mill; producing enough electricity to power 36,000 homes; recycling the equivalent of 20,000 cars of steel and 166 million aluminum cans; and reducing GHG emissions by 2.2 million tons of carbon dioxide equivalents (CO₂e). We also receive commercial waste collected in New York City by private haulers. (Reworld)

Waste-to-Energy (WTE) is a proven technology that safely converts post-recycled municipal solid waste (MSW)—which would otherwise be landfilled—into reliable baseload energy. WTE plants use advanced combustion systems and state-of-the-art emission controls to generate electricity and/or steam. Unlike traditional forms of energy generation, WTE facilities serve a dual purpose: generating baseload energy and providing critical infrastructure for solid waste disposal. Using WTE technology allows DSNY to manage its waste flow responsibly while meeting its goals of GHG diversion in the waste sector. Further CEC recognizes NYC's SWMP as an example of good leadership in the transition to a more circular economy. As part of a circular economy, WTE plays a critical role by prioritizing materials recovery and providing energy in a way that maximizes benefits to the city, residents, and the environment. (USCEC)

Higher Energy Yield: WTE generates more than 10 times more energy per ton of waste than LFGTE [landfill gas-to-energy], delivering more power with less land use and putting America's waste resources to work instead of letting them rot in landfills. (USCEC)

PFAS Destruction: WTE plants are specifically designed to destroy complex organic molecules such as PAHs [poly aromatic hydrocarbons], VOCs [volatile organic compounds], and PFAS through boiler design and combustion controls. (USCEC)

WTE facilities have been demonstrated to reduce CO₂ emissions. It has been proven through scientific carbon-14 methods (ASTM D6866 protocol) that typical MSW WTE stack emissions, that routinely meet the Maximum Achievable Control Technology (MACT) standards, contain between 40-65% biogenic CO₂, i.e., renewable bio-carbon. Ultimately, WTE efficiently recovers energy and materials while decreasing the need for landfill capacity and consequent methane emissions, and it offsets fossil fuel energy with raw material extraction. Therefore, failing to renew the Essex contract is inconsistent with NYC's climate objectives. (CCNY EEC)

Landfills are finite, increasingly costly, and the largest source of methane emissions in the waste sector. Even with gas capture, leakage is unavoidable. Waste-to-energy reduces waste volume by up to 90 percent, avoids methane generation, and displaces fossil fuel energy. Any credible master plan must evaluate these impacts using full lifecycle analysis, not stack-only emissions. (NYSWTE)

Comment 202. USBC commends DSNY, DEP, and MOCEJ for their coordinated approach to evaluating pyrolysis technologies. Successful deployment will require sustained collaboration, and the Draft Plan indicates that such structures are already in place. (USBC)

Response 202. DSNY acknowledges the support for evaluating pyrolysis technologies and will continue to monitor this field through market and technology research, attendance at industry conferences, and attention to state and federal policy development, reporting on updated findings in SWMP biennial reports (**Strategy 78**).

Comment 203. When analyzing advanced thermal treatment of residual waste, ensure that any facility is sized small enough to align with the city's zero waste goals. (CZWD)

Response 203. Comment noted.

Comment 204. The SWMP could include: A roadmap to significant reductions in disposed waste tonnage and waste export costs over the next decade, with an emphasis on reducing the quantities of waste

incinerated in EJ communities such as the Reworld Essex facility in New Jersey. As diversion rates increase with investments in education, enforcement, and recycling and composting facilities, DSNY could reduce the number of refuse collection routes, increase the number of compost and recycling collection routes, and reduce or eliminate contracts with waste incinerators and landfills. (NYLPI)

Response 204. *SWMP26* includes strategies for waste diversion (through prevention, material reuse, and material recovery) to reduce waste generation and subsequent incineration or landfilling. The following programs address diversion: Waste Prevention and Reuse, Organics Diversion and Recovery, Residential Recycling, Commercial Waste, Construction and Demolition Waste, and Special Waste. The implementation of *SWMP26* is expected to result in a projected 30.5% diversion rate for DSNY-managed municipal solid waste, and 54.7% diversion rate for New York City commercial waste as described in **Chapter 7** of *SWMP26*.

Comment 205. Summary: DSNY should not consider or support the use of advanced thermal treatment (ATT) technologies in *SWMP26* programs and initiatives. All forms of thermal treatment are harmful to humans and the environment, including ATT technologies, which have not proven to be viable alternatives to landfilling or incineration.

Response 205. Attachment H, Review of Advanced Thermal Treatment Technologies describes ATT, including the challenges with the existing facilities in the United States. Considering thermal treatment as an alternative is a New York State Department of Conservation requirement for Local Solid Waste Management Plans¹²⁴ that DSNY has satisfied by reporting on these technologies and committing to keeping up with technological advances as part of **Strategy 78**, continue to monitor the field of thermal treatment technologies through market and technology research, attendance at industry conferences and attention to state and federal policy development, reporting on updated findings in *SWMP26* biennial reports. DSNY is not endorsing, or proposing to site or use, any new ATT facilities. Rather, DSNY sees the value in keeping an open perspective regarding future developments and will come to decisions regarding emerging technologies by evaluating data, including information on health, environmental justice, climate change, air quality, costs, capacity, and other factors. DSNY intends to consider a multitude of waste management strategies and track advancements in waste management technology.

Detailed Comments

The Draft Plan states that “advanced thermal treatment (ATT) technologies are of interest to DSNY as potential alternatives to landfilling and traditional thermal treatment (incineration).” This vague endorsement of high-heat waste burning technology is deeply problematic and DSNY should not consider any form of incineration as a part of its efforts to reduce and divert waste. All forms of incineration—including “traditional” incinerators, gasification technologies, so-called “chemical” or “advanced” recycling, and any other technology that uses heat to break down waste—emit dangerous pollutants including lead, mercury, dioxins, and PFAS.¹²⁵ Studies have shown that the pollutants emitted from waste incineration are persistent, bio-accumulative, and toxic.¹²⁶ Exposure to these toxics can lead to adverse health effects such as cancer, heart defects, and respiratory issues.¹²⁷ The Draft Plan acknowledges that waste incinerators are disproportionately located in environmental justice communities,¹²⁸ yet fails to recognize that supposed “advanced thermal treatment” facilities exhibit the same unjust siting trends.¹²⁹ If DSNY is truly “dedicated to mitigating historic injustices against low-income and communities of color,”^{Error! Bookmark not defined.} it must not

pursue any manner of high-heat waste burning technology in short-sighted effort to divert waste from landfills. Polluting and inequitable high-heat technologies should play no role in the Draft Plan or in New York’s strategy for reducing and diverting its waste. Just Zero urges DSNY to remove all mentions of “advanced thermal technology” as a potential alternative to landfilling in the Draft Plan. (Just Zero)

The NY Sanitation Department would also greenwash incineration, by calling it Advanced Thermal Treatment, as renewable energy. Methane and carbon dioxide are the two worst greenhouse gases, increasing climate change, and the risk of mass species extinctions. (Kronheim)

[Advanced thermal treatment] thermal processing methods are harmful to public health and the environment—particularly in environmental justice communities—and have too many challenges to be a viable solution ... To protect ecosystems and communities—particularly environmental justice communities—from thermal treatment technologies, DSNY should add a strategy to “study the environmental and environmental justice impacts associated with thermal treatment technologies” under **Initiative 4.3** “Monitor Thermal Treatment Technologies.” (CSFL)

Delete support for, or “exploration” of, so-called Thermal Treatment Technologies, however qualified, (*Draft SWMP* at [page] 154) since these technologies are unproven at commercial scale and are generators of significant amounts of toxic air and water pollution. (NRDC)

Comment 206. ... The draft plan rightly identifies that more plastic will be found in the MSW stream in the future. That is because plastic is the replacement for metal and glass components, containers, etc.¹³⁰ In addition, mixed plastic waste has gotten considerable attention over the past decade because technologies exist to convert plastic waste back to plastic feedstock. EEC|CCNY in partnership with BASF has demonstrated that using existing plastic manufacturing assets such as fluid catalytic crackers that up to 50% of mixed waste plastic can be returned to feedstock to make plastic products.¹³¹ The plan to continue to monitor developments of thermal treatment technologies is a good one, however, it is past time to monitor and perhaps time to pilot a project that couples DSNY’s plastic waste stream with a proven technology, such as that from Nexus and others. (CCNY EEC)

Response 206. DSNY appreciates the support for continued monitoring of thermal treatment technologies. **Strategy 78** of *SWMP26* is to continue to monitor the field of advanced thermal treatment through market and technology research, attendance at industry conferences and attention to state and federal policy development, reporting on updated findings in *SWMP26* biennial reports. See also **Attachment H: Review of Advanced Thermal Treatment Technologies**. DSNY has not identified technologies that are recommended for piloting at this time.

Containerization

Comment 207. NYLCV supports DSNY’s efforts to containerize our waste since it will reduce litter on the ground, the mounds of plastic trash bags on our sidewalks, and the rat populations. We are pleased with DSNY’s efforts to implement waste containerization in Manhattan Community District 9 and Brooklyn Community District 2. (NYLCV)

We underscore the need for long-term funding for Automated Side-Loading Trucks and containers. Going forward, NYLCV hopes the City learns from the pilot in Manhattan CB9 and Brooklyn CB2 to implement and fully fund a permanent citywide waste containerization program on our streets to streamline waste and prevent buildup on sidewalks and trashrooms. (NYLCV)

We are encouraged by the planned rollout of containerization for buildings with more than nine units, a change that aligns with MCBR's long-standing advocacy to remove loose bags from sidewalks, reduce rodent activity and improve overall street cleanliness. Many buildings in MCB4 fall within this category and look forward to working with DSNY to ensure that containerization is implemented equitably, efficiently and in a manner that considers our district's unique density and sidewalk constraints. To that end, we request that the department work with local tenant and block associations to determine the best placement location for any on-street containers considering vehicle obligations (i.e., private carting, school buses, drop-off/pick-up locations, etc.) (MCB4)

Response 207. As noted in *SWMP26*, by 2026, all residential buildings with one to nine units are required to use standardized official New York City bins. These steps put requirements in place to containerize 70% of New York City's refuse. To further implement the program, and to address the remaining 30% of refuse, DSNY piloted stationary on-street containers, or "Empire Bins," for larger residential buildings and schools in Manhattan Community District 9 and for schools in Brooklyn Community District 2 in 2025. Participation in this pilot was mandatory for properties with 31+ units. Waste was collected by trucks with automated side-loading. Full implementation of the Citywide Containerization Program is proposed for 2032, and the program is subject to environmental review, with the Draft Scope of Work for the preparation of an Environmental Impact Statement released for public comment on September 17, 2025. DSNY will take your suggestions into consideration.

Comment 208. Instead of many individual bins and plastic bags for each building, large and small, we should only have big curbside bins in public parking spaces or at the curb instead of small bins for everything. Some weeks we have more garbage than a bin will hold so we have to put the bag on top. The bins are a weird shape and do not hold much. Often, the recycling bags blow around and the bins blow over or are tipped over by the sanitation workers and the sidewalk is impassable for wheelchair users and caregivers with children in strollers. Last week an apartment building's recycling bags had blown all over the sidewalk, way more than 50 bags and I could not continue to my destination. I had to go into the street with traffic and try to get to the other side of the street. (Ryan)

We strongly support fast-tracking better containerization for schools, which experience some of the heaviest daily waste volumes and can become focal points for litter and rodent concerns. Consistent standards for school waste setouts and equipment would greatly benefit the surrounding community. (MCB4)

Response 208. See Response 208.

NYCHA

Comment 209. We support efforts by NYCHA to upgrade waste storage and collection areas to improve compaction and containerization, in addition to providing larger collection bins at NYCHA campuses. (NYLCV)

Response 209. DSNY and NYCHA appreciate the support of our efforts. NYCHA is continuing to make substantial investments in new waste yards.

Comment 210. Clearly identify and disclose the recycling strategies currently implemented on NYCHA campuses. (ICGT)

Response 210. DSNY supports NYCHA's efforts to improve setout of materials and increase waste diversion by providing recycling training to caretakers and staff, coordinating resident engagement, enrolling NYCHA developments in ecycleNYC, and attending outreach events to promote DSNY initiatives. NYCHA is participating in DSNY's expanded organics collection program, establishing new in-building organics collection (brown bins) at College Point and Leavitt in Queens, and supporting sidewalk organics collection bins (Smart Bins) at 39 NYCHA sites across the five boroughs. As part of DSNY's Smart Bin program, DSNY prioritized placement of Smart Bins near NYCHA properties to provide NYCHA residents with access to food waste recycling locations. DSNY also conducted tabling events to promote the program as well as site visits to assess how residents are using the bins.

DSNY's organics initiatives include the establishment of a "closed-loop" organics waste management system within NYCHA, making use of the eight farms that NYCHA hosts throughout the five boroughs to collect and process food scraps and yard waste. NYCHA residents are provided with finished compost for NYCHA grounds, community gardens, and urban farms. NYCHA's sustainability agenda includes a waste management and recycling strategy. DSNY is also implementing sustainable waste management and recycling initiatives, including centralized waste yards, a need that was identified by the *NYCHA 2.0 Waste Management Plan* and was funded by the 2019 *City Capital Management Plan*, with estimated completion by the end of 2029. NYCHA is also exploring pneumatic waste collection at the Polo Grounds. The system uses underground tubes to transport waste and recyclables to a central facility for DSNY pickup.

Other

Comment 211. As long as [export for disposal remains at the cornerstone of our solid waste management] and new long-term contracts continue to be renewed, there is no impetus to move deliberately towards [Sustainable Materials Management]. Why is DSNY still depending on so much export contrary to its own assessment in the 2006 SWMP? (MSWAB)

Response 211. *SWMP26* includes a wide variety of strategies aimed at reducing waste generation and increasing reuse, recycling, and material recovery. This will reduce the quantity of material sent for disposal. There are currently no landfills or incinerators in New York City, so any material sent for disposal must be exported outside of the city. A priority of the SWMP is to improve and expand programs and work with the public and private sector to increase participation in programs intended to reduce the quantity of waste sent for disposal.

Comment 212. [ICC recommends the following, uplifting "A People's SWMP":] The *2026 SWMP* must commit the Department of Sanitation to establishing a comprehensive program and strategy for NYC to phase down its use of landfills and incinerators for the disposal of municipal solid waste. (ICC)

Response 212. DSNY prioritizes waste diversion and reuse to decrease reliance on landfills and incinerators.

Comment 213. MCB4 strongly supports DSNY's continued refinement of the Residential Waste Management Plan approval process ... The current process represents an important shift toward designing buildings that responsibly manage the waste they generate ... As DSNY works to update this approval process to incorporate organics and all recyclable materials—including textiles and e-waste—we encourage further exploration of strategies that reduce the volume of materials placed at the curb. This includes assessing the feasibility of internal compactors to decrease overall refuse volume and improve on-site storage. For exceptionally large and dense buildings, MCB4 also recommends exploring roll-on/roll-off compactors or similar high-capacity systems to prevent the accumulation of large quantities of bagged waste that may exceed the limits of standard containerization approaches such as Empire Bins. These design-based solutions are essential to achieving cleaner streets, improving diversion rates, and reducing the operational burden on both residents and DSNY. (MCB4)

Response 213. DSNY appreciates your support for updating the residential Waste Management Plan approval process (**Strategy 64**). Additionally, DSNY will consider the use of compactors under the containerization program.

Comment 214. The *Draft SWMP26* does not present the underlying data in a way that clarifies what remains in the refuse stream after source separation. Specifically, in Figure ES-2 of the *Draft SWMP26* (and originally in the *2023 Waste Characterization Study*), DSNY presents the residential waste composition using aggregated discards rather than refuse-only composition. This creates confusion among the public on the waste situation in NYC. That is, the aggregate pie charts obscure how much recoverable material is not properly source-separated, and readers cannot then discern how much of the 17% diversion rate value is attributable to behavioral failure from how much is attributable to DSNY's system's limits and/or market forces^{132,133} ... our research has demonstrated that DSNY's recycling collection program is one of the best in the world, but our findings also revealed that only 49% of plastic that went in to the proper bins and was sent to SIMS facilities was actually recycled. Further, DSNY should be sure they balance education/outreach resources appropriately because reuse will only impact 1.2% of the municipal waste stream and will not increase much more.¹³⁴ (CCNY EEC)

Response 214. **Figures 2-6 and 2-7** of the *Draft SWMP26* provide information on generation and diversion by material type. The *2023 Waste Characterization Study* also provides information on the capture rates by material type. DSNY agrees that individual behavior, processing technology, and markets all affect diversion. DSNY developed the *SWMP26* Education and Outreach Program to improve behavior, included strategies to monitor technological advances and collaborate with stakeholders to address system limitations, and will work to develop markets for recyclable materials through City agency purchases, projects, and contracts. DSNY will continue to improve data collection and reporting.

Commercial and Industrial Waste Program

Comment 215. Mill supports DSNY's interest in enhancing commercial waste management solutions in New York City. (Mill Industries)

Response 215. Thank you for your support.

Commercial Waste Transportation and Infrastructure

Comment 216. Summary: DSNY should accept commercial waste and recycling at Marine Transfer Stations.

Response 216. As part of *SWMP26* implementation, DSNY will continue to assess the viability of accepting commercial waste at City-owned transfer stations, in alignment with the rollout of the Commercial Waste Zones Program (**Strategy 71**).

Detailed Comments

Add commitments to advance the strategy originally set forth in the city's *2006 Solid Waste Management Plan* to utilize excess capacity at the city's modernized Marine Transfer Stations to accept commercial waste and include a timetable for development of a detailed program for phasing in this strategy over the next three years. (NRDC)

DSNY should accept and process commercial solid waste at all city-owned or operated marine and rail transfer stations and publicly report the amount and type of waste received at such stations on an annual basis. DSNY's marine transfer stations ... have reduced long-range truck traffic and associated climate and air pollution by containerizing and transporting municipal solid waste via barge and rail, more fuel-efficient modes of transportation that avoid congested highway bridges and tunnels. (NYLCV)

The *Draft 2026 SWMP* states that DSNY will continue to monitor and assess the viability of accepting commercial waste at City-owned marine and rail transfer stations, currently exclusively used to containerize and export residential waste. We urge the Department to make a stronger, specific commitment to accepting commercial waste at marine and rail-based facilities, especially where these facilities are proximate to dense commercial districts and could substantially reduce vehicle miles traveled (VMT) by commercial waste contractors in the new Commercial Waste Zones (CWZ) system. We stress that the Final Environmental Impact Statement (FEIS) for the *2006 SWMP* included plans to accept significant quantities of commercial waste collected by private haulers at four marine transfer stations during overnight hours and determined that this would not result in adverse noise or other impacts to adjacent communities. (NYLPI)

The *2026 Solid Waste Management Plan (SWMP)* should commit the City to move forward with the unfulfilled strategy of the current *2006 SWMP* of using municipal marine transfer stations to accept commercial waste which environmental justice communities have long advocated for. DSNY reports have estimated that fully implementing the use of Marine Transfer Stations (MTS) would decrease truck traffic associated with commercial waste collection by 50% citywide ... resulting in corresponding reductions in air pollutant emissions and noise, as well as improvements in traffic safety. A Final Environmental Impact Statement (FEIS) for the *2006 SWMP* was conducted to evaluate plans to accept 3.772 tons of commercial waste collected by private haulers at four

marine transfer stations during overnight hours. However, permit and tonnage data released by DSNY shows that several marine transfer facilities still handle far less waste than their permits allow, ultimately delaying relief to environmental justice communities. With the Gansevoort Peninsula delayed indefinitely as the City has placed an artificial beach on the proposed site, the next SWMP must ensure that there is ample capacity at existing and future waterfront sites to export the Manhattan residential and commercial waste and recyclables via barge. (NYC EJA)

The *2006 SWMP* proposed allowing barge export of commercial waste at the MTSs; however, 20 years later, despite ongoing advocacy from EJ communities, DSNY still does not allow it. Worse, according to Council Member Sandy Nurse, sponsor of the bill that would require it, DSNY has refused to conduct the necessary environmental review. The more waste we can send to these facilities, the fewer dangerous and polluting long-haul trucks on our streets. Additionally, because the MTSs are operated by DSNY, we know we don't have to worry about the usual concerns with private facilities, such as compliance with maintenance regulations and worker protections. DSNY must finally codify a plan to allow commercial waste at the MTSs as part of the *2026 SWMP*. (Reynoso)

The *Draft 2026 SWMP* should commit DSNY to arrange for the West 59th Street Marine Transfer Station to handle both residential and commercial recyclables and direct the Department to identify other potential Manhattan waterfront sites for waste transfers. Currently, the East 91st Street and East 59th Street station both handle less than their permitted capacities. Marine transfer capacity is not optional. It is a core environmental justice safeguard that must remain central in any modern waste plan. The *Draft 2026 SWMP* does not reaffirm NYC's commitment to this critical environmental justice strategy or any proposal to achieve the unfulfilled promise in the 2006 plan to expand the use of marine and rail based facilities particularly the development of the Gansevoort facility to handle recyclable materials. We urge DSNY to recommit to fully utilizing the city's marine and rail transfer stations for commercial waste to reduce truck traffic and emissions and to further explore the acceptance of commercial waste at municipal marine transfer stations. DSNY should ensure that waste export through MTSs is not undermined by over-reliance on long-haul trucking or incineration pathways but should instead incentivize the increased use of rail facilities. Under the *2006 SWMP*, DSNY was to utilize both publicly and privately owned rail transfer stations, but recent data shows that the majority of these rail facilities handle far less waste than their permits allow. (TDT)

Comment 217. With the failure to construct a planned barge-based facility for recyclables on the Gansevoort Peninsula in Manhattan, we urge that the *2026 SWMP* include plans for a similar Manhattan site to transport recyclables and construction and demolition waste from the borough via barge. (NYLPI)

Response 217. DSNY will partner with EDC to implement the Blue Highways Program, which includes expanding waste and material freight opportunities via barge. DSNY will also ensure continued capacity for transferring and recovering recyclable materials (**Initiative 3.1**) and monitor commercial and industrial recycling rates and processing capacity (**Strategy 87**). In addition, DSNY already transports paper by barge from the 59th Street Marine Transfer Station.

Commercial Waste Zones

Comment 218. Summary: DSNY should commit to implementing the Commercial Waste Zone Program in the remaining zones as soon as possible, with a clear and ambitious timeline made available to the public.

Response 218. DSNY has committed to full implementation of the Commercial Waste Zone (CWZ) Program by the end of 2027. The rollout schedule for CWZs can be found at: <https://www.nyc.gov/site/dsny/businesses/cwz/rollout-schedule.page>. The CWZ Program includes incentives for businesses and haulers to improve recycling rates.

Detailed Comments

[Suggested] Strategy: DSNY will establish a firm timeline for the citywide transition to a fully zoned collection system by 2026 and enforceable implementation measures to ensure that DSNY achieves the comprehensive safety, equity, and environmental goals set forth by the City Council in Local Law 199. EANY commends actions taken thus far to reduce the impact of commercial waste on New Yorkers, but believe significant action is still needed. After many delays, the implementation of the citywide Commercial Waste Zones (Local Law 199) should have reduced the commercial waste trucks operating across the city, thus reducing significant greenhouse gas emissions, and positively impacting air quality and health. With implementation currently only occurring in one zone (Central Queens), and a time for implementation for four others, transparency is lacking in regard to the 15 other zones. Ensuring a clear pathway for transition is critical in eliminating millions of truck miles every year and we urge DSNY to consider this within their SWMP. (EANY)

On page 157 of the Draft Plan, the Department notes its intent to implement Commercial Waste Zones and expresses optimism that the program will improve waste management citywide, reduce commercial collection truck traffic, and incentivize recycling. However, when reviewing the Commercial Waste Zones webpage on the Department's website, I noted that for Brooklyn North, as well as several other regions, a zone rollout date has not yet been announced. Would the Department be able to provide clarification as to when rollout dates will be confirmed for zones whose timelines have not yet been publicly released? This information would help ensure that small businesses and community members have adequate opportunity to understand the program and raise questions with DSNY or their elected officials in advance of implementation. (Gallagher)

The Department previously set the implementation start and end dates for the first five CWZs: Queens Central, Bronx East, Bronx West, Queens Northeast, and Brooklyn South, and the next two CWZs proposed are Queens West and Lower Manhattan, both starting on April 1, 2026. This means DSNY still has thirteen CWZs remaining to implement. DSNY still has thirteen CWZs remaining to implement ... NYLCV stands with advocates⁵ calling on DSNY to release an implementation timeline for the entire CWZs system by the end of 2026. We hope the City will dedicate the requisite amount of resources and funding for staffing, education, and outreach to fully implement the CWZ law and incentivize businesses and haulers to improve their recycling rates. (NYLCV)

The 2026 SWMP should set a more ambitious timeline for citywide implementation of the Commercial Waste Zone Program, and stress that implementation and administration of the CWZ Program is self-funding, as each awardee is contractually required to pay \$116,000 as contracts for

service in each zone are initiated, generating approximately \$7 million in annual administrative revenue once the program is implemented citywide. (NYLPI)

The legislation that I am most proud of from my time as Chair of the City Council's Sanitation Committee is Commercial Waste Zones (CWZ). This program addresses myriad issues with the private carting industry ... DSNY significantly delayed the program's implementation and made major changes, prioritizing price over all other factors when selecting carters, and creating a years-long rollout plan that further delays reforms. The plan that we created was carefully crafted to incentivize recycling and diversion rates, good jobs, and clean fleets. Meanwhile, delayed implementation has meant more unnecessary vehicle miles traveled, more unsafe working conditions for transfer station employees, and more dangerous trucks on our streets, as carters delay investments due to uncertainty. The agency's claim that the original plan would cause costs to skyrocket is not borne out by the findings of their own environmental review, which showed that increased efficiencies would offset any increased costs for the carters ... at the beginning of the program, the City Council and Mayor negotiated to allocate 38 staff specifically dedicated to CWZ plus funding for outreach and marketing in the budget. However, according to DSNY's most recent Biennial SWMP Update (revised in November 2025), the Bureau of Commercial Waste had only 12 full-time staff, with 10 Sanitation Police Officers assigned to CWZ enforcement. I encourage DSNY to revisit CWZ as part of the 2026 SWMP, with goals of: speeding up the program's rollout; imposing high enforcement standards that remove bad actors from participating; revisiting the awardees' Zero Waste Plans to ensure compliance; making the Zero Waste Plans public so that businesses have more information than price to evaluate when choosing between carters; and increasing headcount for the Bureau of Commercial Waste, including more resources allocated to outreach, education, and communication with carters. (Reynoso)

TDT has long advocated for the implementation of the Commercial Waste Zone (CWZ) Program which has seen much delay in its implementation since the passage of Local Law 199 in 2019. The draft SWMP does not establish a timeline for the implementation of the CWZ program which only further delays the various environmental benefits, stronger worker protections and overall community health and safety benefits that were envisioned when the law passed. DSNY should commit to the full implementation of the CWZ Program by the end of 2026 and incorporate enforceable measures that will achieve the goals of Local law 199. (TDT)

Comment 219. The CWZ [Commercial Waste Zone] system provides many opportunities to continue moving NYC towards its climate and equity goals including incentivizing haulers to use marine and rail-based transfer and recycling facilities to reduce VMT [vehicle miles traveled] and pollution in communities with unfair concentrations of private truck based waste facilities—North Brooklyn, South Bronx, and Southeast Queens communities. These communities not only have a higher percentage of people of color living below the poverty line, but also have some of the highest asthma rates as a result of this unjust siting. Although waste handled by transfer stations has decreased by 17% since 2019, research shows that 75% of privately managed waste is still being trucked to just five communities out of New York City's 59 community districts so more improvements are needed.¹³⁵ (TDT)

Response 219. DSNY will continue to participate in the development of the citywide *EJNYC Plan* and annual progress reporting (**Strategy 79**) and consider the distribution of environmental justice benefits as part of *SWMP26* program implementation (**Strategy 80**).

Comment 220. The Commercial Waste Zones Law (LL199 of 2019) has enormous potential to uplift historically exploited workers, eliminate millions of unnecessary truck miles from our streets, and divert millions of tons of commercial waste from landfills and incinerators, and we are glad to see CWZ centered in the *Draft 2026 SWMP* as a major waste reduction initiative. We are strongly supportive of the pricing incentives included in CWZ contracts that are creating substantial per-ton discounts for source separated organic waste and recycling collections compared to refuse services as the program is rolled out in each zone. (NYLPI)

MCB4 has consistently advocated for stronger oversight and route rationalization in the commercial carting sector. We therefore welcome DSNY's commitment to implementing Commercial Waste Zones and establishing consistent standards, expanded organics requirements and improved data collection. Our district experiences extraordinarily high commercial activity—from restaurants and entertainment venues to retail and office uses—and we anticipate that Commercial Waste Zones will reduce truck traffic, improve nighttime street conditions, and support higher diversion rates. (MCB4)

We continue to strongly support the rapid implementation of Local Law 199 of 2019, also known as the commercial waste zone law, mandating a citywide transition for how our commercial waste is handled. We are pleased that the City has advanced the roll out of some zones, however, we strongly urge the City to fully implement all zones by 2026. (NYC EJA)

Response 220. Thank you for your support of the CWZ Program. DSNY announced a plan to fully implement all CWZs by the end of 2027.

Comment 221. Add commitments to step-up implementation and enforcement of the Commercial Waste Zone Program and ensure that carters in all zones are complying with worker protection and fair labor practices. (NRDC)

The *2026 SWMP* should also signal support for monitoring and enforcement efforts to ensure that waste zone haulers with a history of safety, labor, and environmental violations are meeting the highest performance standards in these areas throughout their ten year contracts or face penalties—including cancellation of their contract—in the event of poor performance. (NYLPI)

Response 221. The CWZ Program includes extensive measures for implementing and enforcing the program. Reporting requirements, including publicly available annual reports, are described in Section 20-60-20-62 of Title 16 of the Rules of the City of New York (<https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYCrules/0-0-0-130034>)

Comment 222. ... the Commercial Waste Zone reform plan established by Local Law 199 of 2019 requires scrutiny, as certain areas of the industry [were] overlooked. I am concerned as to the rules and regulations as well as oversight that will impact the "Haulers" but not the "Waste Facility Owners." In my community I have haulers as well as waste facility owners who are not haulers but they accept waste from the myriad of third party, independent truckers that exist. While the CWZ legislation clearly addresses haulers it is unclear if any consideration was given to the non-haul facility owners who are allowed to continue to accept waste from everyone, anywhere, including any independent trucker and the public. It is unclear if any zone requirements that exist for haulers exist for those third-party truckers that do business at those waste stations.

What are the rules and regulations of those non-haul transfer stations under the Commercial Waste Zone Legislation?

On visiting one of the waste stations in our area I was informed that they are not included in the CWZ law as they are not Haulers. My concern is, if this is true, then does that mean that any independent truck from anywhere can continue to conduct their business with no regard for the newly implemented zoning laws put in place to reduce truck traffic and emissions/pollutants that exist in environmentally overburdened areas? ... it sounds like "business as usual." (Scarborough)

Response 222. The CWZ Program regulates waste haulers, not transfer stations. Transfer stations are permitted by DEC under state law and DSNY under the NYC Administrative Code. Federal law (interstate commerce) generally prevents restrictions on waste acceptance at facilities and across jurisdictional boundaries. All commercial businesses in New York City must sign a new service agreement with a zone-authorized carter when their zone is rolled out. The rollout schedule is published on the DSNY website.

Comment 223. Summary: *SWMP26* should include incentives for Commercial Waste Zone haulers to support waste diversion and reduction in their zones and reduce vehicle miles traveled.

Response 223. The CWZ Program incentivizes waste diversion and reduction through favorable pricing for recyclables and organics and is expected to decrease the amount of commercial waste managed at landfills. One of the goals of this program is to reduce commercial waste collection truck traffic, thereby reducing traffic congestion and noise and improving air quality. **Initiative 1.6** is to study incentive-based waste management policies to inform programming. **Strategy 46** is to work to increase the amount of food donated for food-insecure New Yorkers by commercial generators of food waste. **Strategy 86** is to research barriers to higher commercial and industrial diversion rates and identify potential solutions.

Detailed Comments

We recommend the inclusion of additional mechanisms in the *2026 SWMP* to align and strengthen incentives for CWZ awardees and businesses to reduce disposed waste: DSNY should incorporate customer education on food rescue programs, community-based micro haulers, and waste reduction strategies into the extensive outreach, education, and enforcement strategies the department is undertaking in each zone. (NYLPI)

Do a comprehensive analysis of incentive structures and strategies to ensure Commercial Waste Zoning incentivizes haulers to:

- Use City facilities—transfer stations and processing facilities for organics, and recyclables and residuals to achieve the mileage reductions and financial benefits of flow control.
- Divert recycling and organic waste.
- Provide infrastructure—e.g., shared containers on street, pre-processing equipment for organics, which will also improve collection logistics and streetscapes. (Also note there will be legal changes necessary for infrastructure and contracts to be shared between multiple commercial entities.) See our study: *Curb Alert!: Reimagining commercial waste containerization to better support small businesses in NYC*.
- Reduce truck miles. (CZWD)

DSNY should look for ways to incentivize CWZ contractors to reduce quantities of disposed waste in each zone. For example, some policy experts have proposed that the City create a diversion escrow fund that could be distributed to CWZ contractors that successfully achieve waste reduction goals in each zone. DSNY should look for ways to fund and scale up food rescue, re-use, micro-hauling, and local composting solutions for commercial waste, and incorporate innovation and pilot programs into the CWZ program. (NYLPI)

We support the inclusion to study means to incentivize better waste diversion. We assume this includes Save-As-You-Throw as well as other incentives or penalties ... (CZWD)

Comment 224. The *Draft 2026 SWMP* should not only require the City to measure vehicle miles travelled (VMT) across the entire waste system but incentivize decreasing operational VMT as initiatives including Commercial Waste Zones, citywide organics collection, waste containerization, and expanded use of marine and rail transfer facilities are implemented. In order to have baseline data for better comparison and demonstrate the impact of the waste zone system, DSNY should require that designated private haulers awarded waste zones begin reporting VMT data before the transition to each zone ... (TDT) SWMP should include measures to ensure private haulers are on track to reach the City's waste diversion goals by requiring haulers meet uniform organics and other recycling rules for NYC businesses and synchronize public education with the residential sector, incentivize haulers to implement waste reduction and recycling programs and direct DSNY to conduct a waste characterization study within one year after the adoption of the new SWMP. (TDT)

Response 224. All waste haulers contracted under the CWZ Program must track and report VMT as part of their contracts. Contract awardees must ensure that each commercial waste vehicle is equipped with a telematics system that reports vehicle locations, speeds, and VMT in real time. The CWZ Program includes extensive reporting requirements (see § 20-62 Reporting Requirements for Awardees and Micro-Haulers), including annual reports of waste generation estimates, waste characterization studies, customer registers, investments in equipment or infrastructure, and more. Waste haulers must also submit monthly information on warnings or violations issued by local, state, or federal agencies (except for some violations that must be submitted immediately); customer service issues; dump tickets; and delivery receipts.

DSNY publishes annual reports that compile and analyze data collected as part of the CWZ Program, disaggregated by both zone and awardee where applicable.¹³⁶ The FY25 Annual Report compiled information on the following areas for the Queens Central zone, which was the first zone rolled out under the program:

- Business and Community Engagement
- Fees Collected by Carters
- Costs to Dispose of Material at Transfer Stations
- Vehicles Miles Traveled (VMTs)
- Collection Data by Waste Stream
- Enforcement

Cost savings gained by efficient routing are a built-in incentive to reduce VMT. The CWZs enable this by limiting the number of haulers per zone. Haulers are also required to charge their customers

less for the collection of recyclable and compostable material than they do for the collection of refuse, giving New York City's businesses an opportunity to save money while helping divert material from disposal. DSNY will complete a commercial waste characterization study (including C&D debris) by January 31, 2032, per Local Law 14 of 2025 (**Strategy 89**).

Comment 225. Integrate waste reduction messaging and programs across residential and commercial sectors—by taking full advantage of the opportunities for system improvements offered by the implementation of the Commercial Waste Zone system. Both sectors need help to promote “recycle more and right,” diversion of organics, safe recovery of batteries, and numerous other zero-waste initiatives, and should work together on common messaging. DSNY's management responsibility for the CWZ system goes well beyond the regulatory role of the Business Integrity Commission and should be leveraged for this city- and system-wide purposes. Indeed, by the time SWMP26 is implemented it is highly likely that as few as five commercial waste service companies will operate under the CWZ program ... the clear opportunity with full implementation of the CWZ system is to engage with those companies as partners—finding common ground to support innovative and effective zero waste programs, supporting investment in state-of-the-art waste reduction systems, and integrated approaches to containerization. (GS)

Response 225. DSNY will consider these suggestions in implementing *SWMP26 Initiative 5.1*, implement CWZs; **Strategy 85**, monitor the capture and diversion rates of recyclables in CWZs; and **Strategy 86**, research barriers to higher commercial and industrial diversion rates and identify potential solutions.

Data and Reporting

Comment 226. As DSNY acknowledges a lack of data on commercial waste (including organics) collection, will DSNY commit to requiring data and publishing it on open data as residential waste is currently published? On page 3, the plan says “Making efforts to collect commercial data”. However, “making efforts” is far from a plan or commitment to do anything, so if this is the 10-year plan accepted by NYC, we can expect little if any progress. What commitments can DSNY make for collecting and adding commercial data to open data? What steps will be taken and when? What data does DSNY plan to require as part of this plan? (Allen)

The public should be able to easily access designated haulers diversion plans, customer education and VMT reduction plans to increase transparency. (NYC EJA)

Response 226. The CWZ Program includes extensive reporting requirements for haulers (see § 20-62 Reporting Requirements for Awardees and Micro-Haulers), which will allow for improved data collection and analysis. This includes annual reports of waste generation estimates, waste characterization studies, customer registers, investments in equipment or infrastructure, and more. Waste haulers must also submit monthly information on warnings or violations issued by local, state, or federal agencies (except for some violations that must be submitted immediately); customer service issues; dump tickets; and delivery receipts. Contract awardees also must ensure that each commercial waste vehicle is equipped with a telematics system that reports vehicle locations, speeds, and VMT in real time.

DSNY publishes annual reports that compile and analyze data collected as part of the CWZ Program, disaggregated by both zone and awardee where applicable. The FY25 Annual Report compiled information from the Queens Central zone, which was the first zone rolled out under the program.¹³⁶

Additionally, as part of the Commercial and Industrial Waste Program, *SWMP26* includes **Initiative 5.4**, improve data quality, with multiple strategies to collect and report data on commercial waste. DSNY will develop additional details as part of *SWMP26* implementation, and the information will be reported in biennial reports to DEC, which will be posted on DSNY's website.

Comment 227. The projections presented for commercial waste, for example, in Table 7-11 of the *Draft SWMP26* ... are unrealistic and set DSNY up to fail to reach diversion goals yet again. Thus, non-source separated refuse will remain a dominant fraction of the City's total waste generation, and system performance and resulting GHG emissions will depend heavily on how those residuals are managed. (CCNY EEC)

Response 227. **Table 7-11** column headers were revised to indicate capture rates for specific materials, rather than diversion rates. Therefore, the material-specific percentages in **Table 7-11** should not be compared to the overall diversion rates. In addition, the projected commercial capture rates for various materials shown in **Table 7-11** should not be compared to the existing residential diversion rate and residential diversion rate trends. With the implementation of the CWZ Program and proposed strategies to capture commercial organics and textile waste, meaningful change is possible. **Table 7-11** represents projections, which is a DEC-required component of Local Solid Waste Management Plans, and these percentages should not be interpreted as diversion goals. In fact, DEC expects Planning Units to update the projections regularly as part of biennial reports. *SWMP26* programs aim to reduce non-source-separated refuse and to more sustainably manage residuals. In managing residuals, DSNY will consider GHG emissions as well as air quality and other factors.

Commercial Waste Prevention, Reuse and Recycling

Comment 228. DSNY states that commercial waste is 40% of waste stream—larger than residential. Thus, we can't continue to ignore this significant waste stream, if New York is ever going to move closer to becoming a less wasteful, zero waste city. (Allen)

Ban industrial waste from municipal solid waste landfills. Industrial waste should be going to a hazardous waste landfill that is specifically permitted for C&D, incinerator ash, and other industrial waste. (CURES)

Response 228. The majority of the city's waste tonnage (64% in 2023) is generated by the private sector, largely due to C&D debris. Excluding C&D tonnage, in 2023, 43% of waste was generated by the private sector and 57% was generated by the public sector. The *Draft SWMP26* was revised with the following text to provide a clearer and more accurate breakdown of New York City's waste by source:

New York City's residents, businesses, and industries (including C&D) generate more than 13 million tons of waste per year ... About one-third of that waste (36% in 2023) is publicly

managed ... In 2023, 48% of the city's waste was classified as commercial/industrial, which includes C&D debris and fill, scrap metal and automotive waste, and privately managed special waste such as used oil and medical waste. C&D debris and fill (soil and rock) account for 40% of the city's waste generation, with 5.3 million tons processed at New York City private transfer stations in 2023. Seventeen percent was classified as commercial/business waste, which includes MSW, privately managed source-separated organics, and commercial recycling of metal, glass, and plastic (MGP); paper; and mixed recyclables.

Waste generated by the commercial sector is regulated by City, State, and Federal legislation and regulations. Enforcement and management of the commercial waste sector is overseen by DSNY and BIC. Unlike DSNY's management of residential and institutional waste streams, DSNY does not collect commercial waste. DSNY included the following initiatives in the Commercial and Industrial Waste Program as part of *SWMP26*: **Initiative 5.1**, implement Commercial Waste Zones; **Initiative 5.2**, expand organics rules; **Initiative 5.3**, increase diversion of recyclables and organics; and **Initiative 5.4**, improve data quality. More information on the Commercial and Industrial Waste Program is available in **Chapters 5 and 6**.

Comment 229. We appreciate the intent of the Mamdani administration's multi-agency push to reduce unnecessary regulations and fees for small businesses. However, our review of 2025 violations on NYC Open Data shows that less than 6% of Sanitation fines are currently issued to commercial businesses, and an even smaller percentage is issued to small businesses. Fair and rigorous enforcement of recycling laws is critical to increasing lagging diversion rates ... (NYLPI)

Businesses not keeping their public areas / sidewalks clean: We want to support community—especially small—businesses, but see many in Astoria not keeping the space outside their shops clean—it's stipulated online that sidewalk and tree pits are to be kept clean, but along 30th and 31st Aves. in Astoria—and many other places in this community—that is not the case. Especially as regards smokers—outside ashtrays should be mandatory at restaurants and bars, and discarding of cigarettes in tree beds, the sidewalk and gutters prohibited. Burn bans have been effected these past years, and discarding cigarettes into leaves or trash piles/waste in the street is also dangerous. (Gorman)

Response 229. DSNY will post collection laws and associated fines for businesses, residents, agencies, and institutions on the DSNY website (**Strategy 124**). DSNY will allow warning periods for new initiatives and issue verbal and written "warning tickets" that provide notice of rules and regulations and ways to avoid a fine in the future (**Strategy 123**). Properties that sweep or blow trash or debris into the street can be reported to NYC311 and a DSNY enforcement agent will observe the location for violations. While *SWMP26* focuses on waste reduction and diversion programs and does not focus on littering, as part of *SWMP26*, DSNY will conduct neighborhood walkthroughs with community partners and elected officials to observe area conditions and apply targeted outreach (**Strategy 122**).

Comment 230. Summary: DSNY should support legislation expanding mandatory organics separation to include all businesses. *SWMP26* should include related strategies and incentives for small businesses, especially restaurants, and expanded education and outreach programs.

Response 230. DSNY will work with New York City Council to expand organics separation requirements to include all businesses and prioritize donation (**Strategy 84**). DSNY will also conduct neighborhood walkthroughs with community partners and elected officials to observe area conditions and apply targeted outreach (**Strategy 122**); allow warning periods for new initiatives and issue verbal and written “warning tickets” that provide notice of rules and regulations and ways to avoid a fine in the future (**Strategy 123**); and post collection laws and associated fines for businesses, residents, agencies, and institutions on the DSNY website (**Strategy 124**). DSNY appreciates your thoughtful suggestions and will consider them during containerization and *SWMP26* implementation.

Detailed Comments

Mandatory commercial organics collection must also be expanded to all businesses as a priority and we need to push the new city council to pass this legislation asap. (Allen)

Enforce the mandatory organics separation rules before expanding them. It is clear that from chain stores to Hunts Point produce market, the largest generators are not complying with mandatory organics separation. Consider a staggered fine schedule based on size / income, as suggested by councilmembers in [the referenced] op-ed.¹³⁷ (CZWD)

Support passage of legislation to make organics collection for composting mandatory for commercial waste, as part of the Commercial Waste Zone Program, and build in incentives for the use of micro-haulers to sustainably dispose of commercial organics while providing green jobs to city residents. (NRDC)

We urge the next [2026] Mayoral Administration to work with the City Council in expanding commercial organics separation requirements to all food businesses by the end of 2026. This was a goal stated in PlaNYC: Getting Sustainability Done.¹³⁸ This expansion must be complemented with robust outreach, education, and enforcement. (NYLCV)

We call on the City to expand the categories of businesses that can be designated by the Department of Sanitation to be required to comply with requirements regarding separation and disposal of organic waste when the commercial waste zone in which the establishment is located goes into effect. (NYC EJA)

We urge that the *2026 SWMP* include new waste diversion programs targeted small business, including: [1.] Enabling businesses to share street containers for organics, recycling, and refuse (a solution being piloted in select BIDs by the Center for Zero Waste Design). This would ensure sidewalk accessibility and make it easier for businesses with limited storage space to source separate organic waste and recyclables. [2.] Encouraging small businesses to cooperatively contract for waste and recycling services, and empowering Business Improvement Districts to negotiate for shared organics, recycling, and refuse collection services for their members. [3.] Enabling space-constrained small businesses to utilize DSNY smart bins, empire bins, and brown bins for organics collection. DSNY could assess a fee to offset the costs of these collection services. (NYLPI)

Mandatory organics recycling and composting for everyone with no exceptions. Way more education is needed for restaurants, office buildings, and residential organics. People are not sure about recycling some things ... Each restaurant has a different system for recycling and it is impossible to figure out. It would help if there was a standard way for restaurants to label their trash

and recycling sorting that customers have to do. It should be very simple with a few words and a few pictures. (Ryan)

Construction and Demolition (C&D) Waste Program

Waste Prevention, Reuse, and Recycling in the C&D Sector

Comment 231. Summary: *SWMP26* should emphasize deconstruction over demolition and include strategies and initiatives promoting circular construction.

Response 231. DSNY will continue to work in close coordination with DDC, EDC, MOCEJ, and other construction related City agencies to advance circular construction practices and reduce C&D waste. This includes aligning City-supported projects with EDC's Circular Construction Guidelines and MOCEJ's Construction and Demolition Material Guidance issued pursuant to the 2022 Clean Construction Executive Order (EO23) and identifying opportunities for continuous improvement and consistent cross-agency implementation. Construction and Demolition Material Guidance was released in February 2026 and can be accessed here:

https://www.nyc.gov/assets/climate/downloads/pdfs/CDM_Guidance.pdf

The guidance document encourages deconstruction over demolition and recommends circular construction practices such as those outlined in EDC's Circular Design and Construction Guidelines.

DSNY, DDC, and EDC will collaborate with City partners to promote the development of infrastructure, markets, and operational pathways that support the reuse and recovery of building materials. These efforts are advanced through *SWMP26 Initiative 6.1*, implement Clean Construction Executive Order (EO23), and *Initiative 6.3*, include C&D waste in the circular economy.

In addition to various material recovery and recycling initiatives, DSNY will collaborate on the *NYC Industrial Plan* and on circular economy opportunities related to building and infrastructure material recovery (**Strategy 98**). Commenter suggestions will also be considered as part of *SWMP26 Strategy 36* (collaborate on the management of woody debris, including direct reuse (milling) through the *NYC Urban Forest Plan*, and on exploring technologies such as biochar production) and *Initiative 6.2* (expand NYC DOT recycling in asphalt).

Detailed Comments

[The SWMP could include an] in-depth study of disposed construction and demolition waste, and proposed standards for the industry that would create good local jobs, improve worker and public safety, and reduce VMT [vehicle miles traveled] in the sector. (NYLPI)

Evaluate projects using EDC circular construction guidelines, improve as required, and work with other construction related city agencies to implement them. (CZWD)

Promote development of infrastructure to support reuse of building materials. (CZWD)

Innovative efforts to divert materials out of landfills, which are disproportionately located in disadvantaged communities, could include developing a formalized wood and tree reuse program,

a construction and demolition material reuse program and incentives, and expanding production and use of recycled asphalt. (NYLCV)

[Recommendation:] Transition from demolition to deconstruction practices. (Sacks)

Come up with an ordinance, if you don't have it, that encourages salvaging and recycling of construction and demolition materials from the waste stream. (CRCQL, Mayfield)

Comment 232. DSNY's draft SWMP mentions Zero Waste practices, such as deconstruction, and more recycling, e.g., of gypsum wallboard construction debris ... Solutions to today's problems [include:] Enact strict testing for hazmat and radiation monitoring before C&D leaves NY instead of only visual inspections. Enact stricter regulations for tracking what is in C&D, since the waste is crushed or shredded, it's unrecognizable. DSNY points out there is insufficient data on this waste. (CURES)

Response 232. These regulations would fall under the New York State Department of Conservation (DEC). To help improve data availability, DSNY will convene construction industry stakeholders to identify and address barriers to reuse, recycling, and beneficial use, and to improve C&D materials data (**Strategy 100**).

Comment 233. Pass policies such as mandatory ceiling tile and GWB diversion (was part of Green Codes Task Force recommendations back in 2010, see RC1¹³⁹ which required ceiling tiles, carpeting, new gypsum wallboard scrap, and large-dimension lumber to be sorted on-site and reused or recycled. Also, require construction-waste management plans for large projects. (CZWD) Require use of a Recycling Certification Institute certified transfer station for city projects. (CZWD)

Much of the waste generated by C&D projects can be recycled or reused, including carpet, scrap lumber, steel, concrete, and ceiling tiles. One example that advocates have suggested to incentivize this practice would involve DSNY working with the Department of Buildings to require companies to submit a waste management plan requiring a certain amount of diversion per project in order to receive a demolition permit. (Reynoso)

Response 233. DSNY appreciates these suggestions and will consider them during implementation of strategies under **Initiative 6.3**, to include C&D waste in the circular economy.

Comment 234. *Reclaim NYC Deconstruction and Reuse Action Plan*¹⁴⁰ should be reviewed and collaboration with the Reclaim NYC group to determine best ways to support reuse should be followed ... Follow recommendations from the *AIANY Building Decarbonization Action Plan*¹⁴¹ under Circularity. (CZWD)

Response 234. DSNY will integrate guidance from these sources as part of implementation of **Initiative 6.1**, implement Clean Construction Executive Order (EO23). DSNY coordinated with MOCEJ to support development of the NYC EO23 Construction and Demolition Material Guidance released in February 2026, which can be accessed here:

https://www.nyc.gov/assets/climate/downloads/pdfs/CDM_Guidance.pdf.

Other

Comment 235. Construction sites: many are not maintained, and garbage/food/rats (both living and dead sometimes!) collect in barriers out on the street, against the wooden fences, and around the premises. (Gorman)

Response 235. Littering, illegal dumping, and dirty conditions can be reported to NYC311, and a DSNY enforcement agent will visit the location to observe violations. While *SWMP26* focuses on waste reduction and diversion and not on littering, addressing cleanliness issues and enforcing rules and regulations that keep the city's streets clean are top priorities for DSNY.

Comment 236. Commingling of waste streams, such as mixing MSW with specialty waste, should be banned. This mixing may dilute the hazardous materials and get it below the legal definition of "hazardous waste." If hazardous waste is cocktailed in with other shredded and crushed waste in large railcars, it may not test above the ppm limit and passes inspection. Waste disposal companies can avoid the high cost of using a hazardous waste facility by mixing it in with regular waste. As the resident by the landfill told CURES: "We were told that PCB and heavy metals such as lead and arsenic were hazardous and banned. Then they shipped in 456,000 tons of contaminated soil that had PCB, lead, arsenic and other hazardous chemicals. It was allowed in because it was diluted with dirt. It doesn't make sense. They are supposed to follow BMP (best management practices), and one listed to prevent hazmat spread is to separate different waste streams. They don't do it, because they make more money on "specialty waste," and they don't live anywhere near the dumping site. It's all about profit when landfills are owned by foreign investment companies. They just mix industrial and residual waste in with MSW and no one knows it's in there. They target poor, rural areas like ours that are unzoned and near railroads. So the legal definition of hazardous (above a certain ppm) provides a loophole." ... DSNY can't shut its eyes to the health and environmental costs its current corporatized waste export to disposal system is dumping on residents and the environment. (CURES)

Response 236. Regulations on the management of solid waste are promulgated by DEC. DSNY acknowledges the potential harmful effects of commingled waste streams and the risks of improper disposal of special waste materials as detailed in **Chapter 5** (Special Waste Program) and encourages all New Yorkers and businesses to properly manage their waste.

Special Waste Program

Comment 237. Summary: Commenters support *SWMP26* strategies to expand special waste collection options and request additional efforts to increase accessibility of special waste disposal for residents.

Response 237. During *SWMP26* implementation, DSNY will evaluate the performance of collection sites as part of biennial reporting and permitting. As part of **Strategy 108**, DSNY will convert the existing Special Waste Drop-Off Sites from registered to permitted facilities. DSNY will coordinate with NYCHA on **Strategy 109** (hold community events in every community district) for events in community districts near NYCHA developments. In addition to DSNY continuing the recently expanded hours at Special Waste Drop-Off Sites (**Strategy 108**), DSNY will research, report on, and consider

incentive-based policies as mechanisms to increase diversion, reduce single-use items, and minimize toxicity in New York City waste streams (**Strategy 17**).

SWMP26 also has strategies to monitor and support EPR policies (typically state legislation) for specific materials including batteries, gas cylinders, solar panels, carpets, mattresses, and packaging. Paint collection is already available NYCHA-wide through the PaintCare program. Electronics recycling is in place at some NYCHA facilities, with expansion planned strategically with waste yard rollouts. Textile recycling bins also represent a growth opportunity for NYCHA diversion to be explored as part of implementation. The success of these diversion programs requires investment in on-site storage space/infrastructure, management staff, central support, and NYCHA residential services staff involvement.

Detailed Comments

We support the increase of local convenient options for disposal of additional waste streams—SAFE materials, textiles, paint. (CZWD)

[Uplifting “A People’s SWMP,”] The 2026 SWMP must commit the Department of Sanitation to increasing accessibility to various programs and sites for electronics, textiles, and plastic recycling programs, for example, by requiring all apartment buildings to join DSNY’s successful electronic waste and textile waste recycling programs. (ICC)

I collect [hard-to-dispose of items] and get to SAFE Disposal events ... not everyone has the time and money to do this. (Gorman)

The expanded hours for special waste collection and the number of collections sites are inadequate. Is there a way to leverage space at NYCHA and train/employ NYCHA residents to greatly expand the collection range? (Lasky)

We strongly support the plan’s intention to expand drop-off opportunities for textiles, paint, electronics, carpets and other specialty materials, as well as DSNY’s commitment to increase community reuse and recycling events in every community district. MCB4 has long advocated for more accessible waste diversion options—particularly for residents in multifamily buildings, NYCHA developments and households with limited storage space. Expanding these programs will help keep recoverable materials out of the refuse stream while also providing more convenient, neighborhood-level opportunities for reuse, repair and proper disposal. (MCB4)

Regardless of the specific type of materials, DSNY needs to hold more in-person recycling drop-off events in accessible areas of the city, whether it’s for e-waste, textiles, or paint. (NYLCV)

We support DSNY’s goal of continuing to hold expanded hours at Special Waste Drop-Off Sites in compliance with Local Law 88 of 2023. (NYLCV)

We recommend that DSNY hold more frequent events for DSNY SAFE (Solvents, Automotive, Flammables, and Electronics). (NYLCV)

I am elderly now and live alone. I don't mind sorting my trash for recycling and composting. I do have issues when I have too much regular trash that will not fit into my bin occasionally as in the case of occasional flooding, cleaning out an attic, etc. I am downsizing as I get older. I would like to see a once a month collection of special trash like TVs and stereos that I am unable because of my age to get to the special collection areas that are set up in the boroughs. (Ruggiero)

Comment 238. I testified last year for a bill that would require the DSNY to run a feasibility study on the recycling of textiles. I want to see movement in these other waste streams, including for electronics waste, which is a very high value return waste stream, that have so many creative uses to redirect resources more intelligently. (McGillivray)

Response 238. DSNY studied and assessed textile collection and has a number of strategies to expand DSNY's textile recycling program under **Initiative 1.1**, advance textile reuse programs and reduce textile waste. DSNY does accept electronic waste for recycling at SAFE Disposal Events, Special Waste Drop-Off Sites, and through its in-building recycling program, ecycleNYC. DSNY will include electronic waste and textiles in the update to the residential Waste Management Plan approval process for multiple-dwelling buildings (**Strategy 64**). DSNY included numerous strategies to expand the collection and recycling of various materials.

Comment 239. We also second DSNY's support for an EPR program for lithium rechargeable batteries and urge Governor Hochul to sign legislation to establish such a program that passed both houses of the state legislature in June of this year [2025]. (NYLCV)

Response 239. Thank you for your support.

Comment 240. Special waste in the draft SWMP omits cigarette butts, which is a form of plastic. The butts contain heavy metals and other toxic chemicals and are one of the most littered items in the world. They pollute soil, water, and air. Such chemicals are carcinogenic, endocrine disruptive and neurotoxic. Two measures have been recommended to deal with the problem; one, educating the public to avoid littering the ground with butts, has been tried with some success in California's Undo program. The Undo program used on-line messages to describe the health and environmental hazards and the importance of trashing butts rather than dropping them on the ground¹⁴² ... The second measure is a law to ban the sale of filtered cigarettes ... two such bills introduced in New York State by Senator Liz Krueger failed to pass. But California met with some success. Santa Cruz county and the cities of Santa Cruz and Capitola enacted the world's first filtered cigarettes sales ban to be effective January 1, 2027. The earlier messages describing the hazards of butts are likely to have contributed to passage of the bill. My recommendation for the SWMP is to work with the Health Department in developing messaging regarding health and environmental hazards of butts and what smokers can do. Such messaging is just the beginning of a campaign to ban the sale of filtered cigarettes. (Bialik)

Response 240. DSNY can consider specific messaging about littering cigarette butts as part of the Education and Outreach Program and consider advocating EPR laws for cigarette butts. Advocating for banning the sale of filtered cigarettes is outside of DSNY's scope.

Education and Outreach Program

General

Comment 241. Summary: DSNY should use existing data and available research to focus education and outreach in Community Districts that have the lowest recycling rates, including targeted campaigns for

property managers and building owners. DSNY should also work to address the socioeconomic factors impacting participation rates in these districts.

Response 241. DSNY is aware of varying capture rates between DSNY Sanitation Districts as well as variations in the types of material disposed as discussed in the *2023 Waste Characterization Study*. As part of **Strategy 26**, increase participation in the DSNY curbside collection program, DSNY will study and work to address barriers to waste reduction and recycling. DSNY will also monitor the effect of residential containerization on recycling capture rates and quality (**Strategy 65**).

DSNY will consider your suggestions regarding research and reporting on waste diversion and recovery based on socioeconomic factors as part of **Initiative 1.5**, to improve data collection and reporting on the benefits of reuse. Additionally, building density can impact waste and recycling collection operations and recovery rates. DSNY will offer online information sessions, training on new programs, and technical assistance on DSNY rules and regulations to building management and staff (**Strategy 111**). DSNY will take these suggestions into consideration for **Strategy 26**, increase participation in the DSNY curbside collection program.

DSNY can consider using Residential Waste Management Plans to target outreach under **Initiative 8.1**, work to increase diversion and reduce contamination in all recycling streams. DSNY will also update the residential Waste Management Plan approval process for multiple dwelling buildings to ensure all recycling streams are included (**Strategy 64**), including textile and electronics recycling available through refashionNYC and ecycleNYC.

Detailed Comments

DSNY's recycling programs is theoretically implemented "city-wide," recycling rates vary by neighborhood, where lowest and highest recycling rates per Community District have held a wide average range of 5%-29% for the past decade.¹⁴³ Past research on NYC recycling identifies the association of these community-level differences with socioeconomic (SES) factors such as income, education, and race, but attributes poor recycling behaviors to barriers in safety, cleanliness, convenience, and program comprehension at the level of the residential building and the municipality (Clarke & Maantay, 2006; Clarke, 2004).¹⁴⁴ Multiple studies show that environmental attitudes, such as self-efficacy, perceived community norms,¹⁴⁵ and satisfaction with service quality are key drivers of recycling behavior, and underperforming waste programs where there is lack of security, ventilation, space, or convenience can create barriers to recycling.¹⁴⁶ These barriers become amplified in multifamily buildings, where building-wide recycling programs occur within the citywide recycling program. Four studies and industry organizations identify property managers as essential influencers to [multi-family building] residents' recycling participation,¹⁴⁷ indicating that DSNY may be able to make substantial gains in recovery rates through targeted campaigns to specific community districts. (D. Cooper)

Our results showed that districts with similar socioeconomic and density profiles can differ substantially in their building-size distributions and thus, the presence of [property managers (PMs)] and building waste management systems. Unfortunately with public data, we could only estimate PMs as present in buildings with over 9 units ... this represents an opportunity for DSNY to coordinate with property owners to learn more about how many and how effective building's onsite property managers are and can be ... Built-environment characteristics—particularly the share of MF [multifamily] buildings and associated building-level management systems—are a meaningful factor for differences in recycling rates, above socio-economic conditions. DSNY could

use results like this and their own community-district level research to emphasize community-level, targeted campaigns for property managers and building owners beyond their website encouragement for building owners to attend Clean Building Trainings. (D. Cooper)

DSNY can analyze the submitted Residential Waste Management Plans for buildings with over 150 units to further identify where targeted residential or property management campaigns would be most useful for increasing city residential recycling rates. (D. Cooper)

It would be helpful to understand whether the Department has identified neighborhoods or regions with persistently low recycling diversion rates that could benefit from focused educational programming and outreach. (Gallagher)

A journal article, co-authored by the current chair of MSWAB's long range planning committee, that studied diversion rates by various demographic groups across the City found that good participation is well correlated with higher income, education, and other demographics (over 80% correlation). The converse is also true ... Funds should be targeted towards the poorly participating districts to address the specific reasons for the poor participation so that they can be addressed. (MSWAB)

Comment 242. DSNY received a [Recycling Education and Outreach] EPA grant. How were those funds spent and what were the results? Does DSNY have a wish list for [outreach and education] for the new administration? That should be included in this plan as well. While we can't rely on social media alone, there is an opportunity to leverage Mayor Mandani's strong social media skills and partner with the new Office of Mass Engagement and multi-cultural outreach to promote DSNY programs to NYC's diverse population. What percent of DSNY [outreach and education] is allocated to social media? (Allen)

Response 242. In the spring of 2026, DSNY ran a six-week targeted advertising campaign about the Citywide Residential Organics Program. The campaign was directed at residents of multifamily buildings and funded using the EPA Recycling Education and Outreach grant.

The SWMP is a 10-year planning document, extending beyond the mayoral terms with implementation requiring collaboration between DSNY, other City agencies, City officials, residents, and businesses. Social media engagement is a notable component of the Education and Outreach Program. In addition to other strategies where social media may be leveraged for Education and Outreach, DSNY will create multilingual outreach materials for all waste programs and share them on DSNY's website, via social media, and by mail (**Strategy 110**) and provide relevant and engaging content on all appropriate social media platforms (**Strategy 116**).

Comment 243. Summary: More education and outreach is needed to reduce waste and recover material for reuse and recycling. Tailored and diverse outreach and engagement efforts are needed to reach more New Yorkers regarding the importance of recycling and composting and to increase awareness of the opportunities to divert waste from disposal.

Response 243. DSNY understands that education on waste is crucial for waste reduction and diversion and that diverse outreach and education materials are needed to reach over 8 million New Yorkers. DSNY will work with NYCPS, agencies, and other stakeholders on identifying steps to implement Education and Outreach initiatives and will report on the steps taken and results achieved in

biennial reports to DEC. DSNY makes the biennial reports available to the public on DSNY's website. The Education and Outreach Program includes 15 strategies to continue and bolster DSNY's education and outreach efforts in collaboration with communities, community-based organizations, and elected officials. The following strategies also promote approaches to education and outreach that are more accessible and tailored to different communities' needs:

Strategy 110: Create multilingual outreach materials for all waste programs and share them on DSNY's website, via social media, and by mail.

Strategy 114: Conduct door-to-door neighborhood canvassing for new initiatives or in areas with low compliance with waste management regulations.

Strategy 117: Craft digital tool kits to provide downloadable content to be used by community groups to further outreach and education.

Strategy 120: Train community groups on DSNY services and talking points to help them be well informed "ambassadors" of DSNY programs.

Strategy 121: Encourage community groups to use culturally relevant engagement strategies to tailor their message and event formats to diverse communities.

Detailed Comments

Attitudes about waste are as diverse as New York residents and will require new approaches and extensive outreach and education to change behavior and raise awareness that the majority of items in the garbage are actually not garbage—just no longer wanted. (Allen)

In my doctoral research in the 1990s, I learned that not everyone is motivated to participate in recycling programs in the same way. Only the eager beavers read brochures, and they are a small fraction of the population. Others get information from broadcast media, some pay attention to social media and others from friends, neighbors and family. Some require repeated outreach of varying approaches. One or two brochures a year won't be sufficient for most. Reminders are necessary. Some people need targeted approaches to motivate them to participate; one size does not fit all. Some New Yorkers don't pay attention at all and require incentives to participate and fines if they don't. The City would do well to study, pilot, and fund these methods to maximize participation everywhere. (Clarke)

We have the necessary infrastructure in NYC to divert recyclable materials and also process them responsibly. However, while we have the most sophisticated resources readily available, too few New Yorkers are aware of how to compost or recycle properly and why they should do so, thus causing us to repeatedly miss the mark on our aggressive yet achievable zero waste goals. Outreach and education need to go above and beyond mailers and flyers which wind up as trash that residents may or may not read. (Dookie)

[Design] and [disseminate] educational materials targeted to different segments of the population, consistently and frequently enough, varying the approach to keep interest high ... Also include studies to understand the level of the public's understanding of the collection programs and attitudes towards participation by different segments of our population and how different demographics can best be motivated to participate. (MSWAB)

[According to studies conducted by the comment author in 2004-2005] ... the main reasons for non-participation was forgetting to recycle and being confused about what to recycle (60% of responses). (MSWAB)

Design and initiate public education programs at a scale to meet the challenge: To convince New Yorkers to sort their organics for composting or their metals, glass and plastics for recycling requires that DSNY initiate and continuously re-engage with the public. New Yorkers need to know and be reminded of how to compost and recycle and why it is important to do so. And since people receive information differently, there is no one-size fits all mechanism to inform New Yorkers about recycling, composting, and waste prevention. Unfortunately, without a major breakthrough on public education and engagement, it is doubtful that the Department, despite its best efforts, will be able to bring about any significant change in waste handling and disposal practices of the more than 8 million city residents. The *Draft SWMP*, to its credit, describes several education and outreach initiatives that, if fully implemented, could increase public awareness. (*Draft SWMP* at [page] 198.) But their timing is vague, their funding commitments uncertain, and their overall description is so general that compliance with these strategies could be demonstrated however lackluster the Department's future performance might be. (NRDC)

Ensuring that Education and Outreach is in the forefront of our City and the Department is critical to reducing the amount of waste that is transported to landfills. We, as a society, need to do more to convince businesses and people to produce less waste, to recycle properly and to save organics for separate collection. (Queens Community Board 5)

More recycling education is needed. Over the years, the rules have changed so much that the public is skeptical that any rules for sorting trash will stick for long. When we talk about trash, people tell me that they have seen sanitation workers mixing recycling and garbage and they talked with the workers who admitted they do that. (Ryan)

We must encourage New Yorkers to create less waste through either education or incentives. (Shah)

We applaud DSNY's focus on education and outreach to both residential and commercial generators to increase source separation of organics. Education will be a key factor to achieving the goals for *SWMP26*. Recognizing the significance of this effort to *SWMP26*, we request DSNY provide more clarity on what strategies will be utilized to drive participation with residential and commercial generators specific to separating organics at source. (SJI)

We respectfully suggest the following tools/ strategies to assist: Incentives for greater participation; Stronger penalties for non-compliance; Partnering with private sector to encourage behavioral changes specific to SSO; Tailor multiple strategies to resonate with specific CWZ or district; Move away from a "one size fits all"; Partner with community groups, haulers, and facility owners. (SJI)

On page 147, the plan says—expanding education efforts, including in schools and city agencies, could help to improve recycling habits, reduce contamination, and increase the overall effectiveness of DSNY's recycling program. What are DSNY's plans to actually do this? (Allen)

Comment 244. Summary: *SWMP26* should include more and more specific education and outreach efforts, with clear deliverables, benchmarks, and accountability measures.

Response 244. As part of implementation, DSNY will build out education and outreach programming and consider these suggestions for planning, documentation, and tracking progress.

Detailed Comments

Section 8.1 sounds like more of the same—nothing really new and no solid commitment to deliverables. Please add more deliverables ... it appears that it may not be DSNY's job to develop an [outreach and education] plan but relies on others in the administration to draft and fund it for DSNY to implement. What involvement and/or role will DSNY play in the development of a new plan and what was the process in the past? ... few details are provided in this plan regarding outreach and education. Some tactics are listed and vague statements made, but would be helpful if DSNY can provide more details in the plan. Is Exhibit E the marketing plan or will DSNY develop a more comprehensive plan or does someone else in the city do that? If so, who? ... A formal plan with social marketing campaigns must be developed and employed. Perhaps other NYC agencies have had success employing social marketing programs and tactics, which DSNY can study and implement. Has DSNY evaluated social marketing strategies and campaigns to date? (Allen)

ICC strongly urges the *SWMP26* to commit the NYC Department of Sanitation (DSNY) 148 to waste diversion. *SWMP26* must create a plan for the DSNY to invest in, increase accessibility to, and educate the public about waste diversion programs such as recycling, composting, organics collection, and waste prevention. (ICC)

Make Strengthening the DSNY Public Outreach and Education Program a major priority of the Department, with progress to be reported on and measured in the Mayor's Management Reports. (NRDC)

Incorporate yearly benchmarks for what will be achieved under each of the Department's proposed education and training initiatives. (NRDC)

Comment 245. The workforce of this bureau in particular [Bureau of Cleaning and Collection] needs to be more widely praised in the public sphere for their work ... The dangers of their job should be more widely known and appreciated. The collection truck, traffic, and the trash itself all pose serious bodily risks. In the next ten years there should be a strong public campaign educating the city and its visitors with the goal of mitigating the avoidable risks posed to the workforce, such as deadly traffic collisions due to impatient drivers and hazardous materials being improperly placed into the waste streams. Improvements in waste collection equipment and infrastructure must prioritize the well-being of the workforce, even if that means a higher upfront investment, it will pay off in the long run. (Coyne)

Response 245. DSNY will take this suggestion into consideration for educational programming efforts under the Education and Outreach Program. Sanitation workers, New York's Strongest, are essential to maintaining a clean and healthy city and deserve a safe workplace. DSNY has a robust and comprehensive training program for Sanitation workers with a focus on safety; we appreciate your comment acknowledging Sanitation Workers' hard work and your concerns regarding workplace risks. DSNY will also work to reduce the risk of fires associated with rechargeable batteries through proper end-of-life management (**Strategy 104**), since these fires pose serious threats to the health and safety of sanitation and waste management facility workers.

Comment 246. There appears to be a lack of will on the part of the City to address this problem [littering] today. There are very occasional/rarely sighted ads on TV, but a more consistent effort is needed...The pervasiveness of social media gives the City access to a multitude of people, especially young people, who could help to socialize a litter-averse culture! The City should incentivize individuals and communities to submit campaign ideas, posts and ads. (Boyce-Charles)

Response 246. DSNY will provide relevant and engaging content on all appropriate social media platforms (**Strategy 116**). While the SWMP does not focus on littering, DSNY will consider your comment in its communications. For illegal dumping, DSNY does offer an incentive program for reporting people who illegally dump waste and works with City Council Members to install cameras in dumping “hot spots.”

Comment 247. Sanitation needs more media coverage. This past Sunday’s NY Times had the front cover of the Metropolitan section devoted to the success of congestion pricing’s first year. A quick google search didn’t bring up any similar media coverage of the mandatory curbside composting law. Granted it hasn’t been a year yet but the public will be more engaged if and when they hear about how curbside composting is doing. ...Unfortunately, DSNY’s curbside composting program collects only 10% of food scraps and yard waste according to an article in Sentient Media. Seattle collects 60%. New York could get more participation with an increase in public service announcements and community engagement, like what happens at community composting sites. (Leonard)

Response 247. DSNY appreciates this perspective and agrees that mandatory citywide composting is front page news! To increase participation and diversion, DSNY has a number of strategies and initiatives under the Education and Outreach Program to engage with the public and provide information on recycling, organics diversion, and other DSNY programs.

Resources

Comment 248. Summary: More funding and staff should be allocated for outreach and education.

Response 248. DSNY agrees that outreach and education are critical to increasing public awareness of the proper separation of materials and opportunities for diversion. DSNY dedicates ongoing resources to outreach and engagement for existing recycling and sustainability programs. DSNY also partners with many organizations, including the Sanitation Foundation and community composting groups, to bolster the City’s education efforts. As materials are developed for new programs and events, DSNY incorporates them into its ongoing outreach and ensures dedicated and targeted outreach based on each program. For example, in preparation for the rollout of Citywide Residential Organics Program, DSNY canvassed nearly 800,000 New Yorkers, provided a total of 189,959 free brown bins to residents throughout the city, participated in over 1,300 in-person events and over 75 virtual information sessions to educate New Yorkers, sent multiple mailers to every New Yorker as service started in their borough, and took advantage of federal funds for a public campaign for curbside organics on social media and public transit. This robust outreach effort has resulted in a large increase in organics tonnage, and DSNY intends to continue these efforts to further grow this and other important programs.

Detailed Comments

We need a robust, well-funded, on-going public outreach campaign. The city's highly effective anti-smoking initiative ... included PSAs on TV and ads on subways and buses. (350 NYC)

I co-authored a journal article that studied diversion rates by various demographic groups across the City and found that good participation is well correlated with higher income, education, and other demographics (over 80% correlation). The converse is also true. At a recent conference of the New York State Association for Reduction, Reuse, and Recycling (NYSAR3), we learned that the best practice for funding programs that motivate maximum participation in curbside programs requires expenditure of \$10/household/year. With 3.3 million households in NYC, DSNY should be asking the Administration and City Council for \$33 million/year just for funding education and outreach programs. We know that DSNY has been allocating a small fraction of this funding per year for education and outreach, and after over 30 years of underfunding recycling education it is no wonder that we are achieving only about 50% capture rates for recyclables, and after two years less than 10% of organics. (Clarke)

All the 36% of residential waste that could be composted should in fact be composted. To this end, there must be funded education and outreach jobs to ensure residents of our city learn how to do this effectively. The current rate of organics diversion (~10%) is far too low. Funded outreach coordinators are needed to facilitate widescale adoption of these important programs. (Pace University)

Funding is needed for more public education and engagement. Judging from my own co-op building, even well-meaning New Yorkers don't understand what they are to do with trash. I see plastic film and unwashed take-out containers tossed into recycling bins. Plastic grocery bags with compost are tossed into the brown bins ... Last year I participated in the ... City's Trash Academy. It was fun learning about the City's day-to-day operations. It was nice meeting people who were as curious as I was—and to know how many there are of us. Two people I know are enrolled in this winter's session of Trash Academy. (Leonard)

The City has been spending a small fraction/household/year than is recommended by The Recycling partnership as best practice [\$10/household/year] for funding a successful education and outreach effort. (MSWAB)

NYLCV urges DSNY to increase staffing to ramp up outreach, education, and enforcement efforts for the residential organics program, including ensuring that any educational materials are in the designated citywide languages and any other language deemed appropriate. (NYLCV) (The City must increase funding for DSNY staffing to educate and enforce [recycling] in order to increase the diversion of materials collected curbside. (NYLCV)

Collaboration

Comment 249. Summary: SWMP26 initiatives should include more collaboration between DSNY and other agencies and organizations, including NYCPS, DOH, community composters, and community boards to more deeply engage residents and other stakeholders. Increase student agency and civic and environmental education to increase composting and reduce food waste.

Response 249. DSNY and NYCPS recognize the hard work of community groups and the important role they play in educating the public about waste and composting and empowering students to learn more about public institutions, environmental issues, environmental science, and climate action. NYCPS provides students, staff, and other school stakeholders with multiple and ongoing options for waste sorting requirement trainings and events. These educational programs provide immense value and encourage students to be engaged community members. Further, education on composting will likely result in higher ongoing participation in composting programs, recycling, and organics separation.

In addition to learning about the benefits of composting, NYCPS students can also learn about codigestion by visiting the Newtown Creek WRRF. NYCPS teachers are encouraged to go on field trips to both composting sites and the WRRF. NYCPS mentions both composting and anaerobic digestion in presentations about recycling and composting for students and other school stakeholders.

The WRRF's primary purpose is to treat millions of gallons of wastewater each day in order to protect the waters surrounding New York City. The facility uses existing infrastructure to help divert food waste from landfills located far away while producing energy. Newtown Creek WRRF is one of only two large-scale organics processing facilities in New York City. Transport of organic waste to the Newtown Creek WRRF requires a shorter trip than to most other available large-scale organics processing sites. Staten Island Compost Facility is the only other organics processing site in New York City that can process hundreds of tons of material a week. Understanding the inherent resiliency of diversified systems (not putting all eggs in one basket) and the importance of systemic resilience to a city the size of New York could be further integrated into STEM education.

SWMP26 Initiative 8.3 is to collaborate with community groups (including composters) on outreach and education for organics recycling.

Detailed Comments

DSNY and DOH should collaborate and provide more messaging to connect composting and curbside organics collection in rat-proof bins, to rat mitigation. It took years before I heard a public official actually state that connection publicly. Last I checked, there was still no mention of curbside composting on the rat portal or included in DOH communications channels. Every time an elected official talks about rats and containerization, they should talk about composting. DSNY could do that as well. (Allen)

Our students are teaming up with Compost Power to show that local composting on a larger scale is possible in an urban environment. We are now piloting systemic food-waste reduction measures at the source, combined with local community composting. In five pilots so far, our students have reduced overall cafeteria food waste by up to 50%, while increasing student consumption by 15-46%—simply by allowing students to choose what they want to eat within USDA guidelines. These results show that food waste reduction is not about austerity or scarcity. It's about student agency. When students are informed and trusted to make decisions, they waste less and eat more. Our students also mapped the journey of their trash and their organics placed into the brown bin—learning that most food scraps are trucked long distances for codigestion. After considering truck traffic, emissions, and other environmental harms, our students told us they wanted to disrupt these harmful systems. Students regularly visit the site to help process their own food scraps—transforming what would otherwise be a waste burden into a local resource that supports healthy

soil, food production, and community jobs. This work has become a powerful education opportunity. Students are not only sorting food scraps correctly, they are learning why it matters. They are bringing that knowledge home and educating their families, turning daily cafeteria routines into climate action and community engagement ... Our recommendation is clear: Align school organics collection with local processing. (CafCu)

In addition to collecting food scraps, we [Forest Hills Green Team at the Commonpoint Queens compost site] also did a great deal of both environmental and civic education. We distributed masks and hand sanitizer as we emerged from the pandemic; we distributed small bins for people to collect their food scraps; we distributed information about primary and general upcoming elections; we distributed literature about the importance of composting ... We even hosted a very successful Participatory Budgeting voting event that was sponsored by our local Councilmember, Lynn Schulman. Running this site also gave us an opportunity to talk to members of the community ... We have done presentations at MELS HS; Archbishop Molloy High School; Forest Hills High School; PS 174; Halsey JHS. We continue to reach out to schools to do these presentations ... since we shut down ... without this regular weekly activity, it is challenging to provide opportunities for students to get [necessary community] credits. (Laster)

Add commitments to: Partner with and support funding for community composting groups to spearhead composting educational efforts—including both on-site activities at compost processing facilities for the public and school children, as well as training programs for superintendents and building managers (NRDC)

DSNY must leverage connections to local organizations, elected officials, and Community Boards to educate residents about [the residential organics] program in order to change behaviors when it comes to recycling organic waste. (NYLCV)

DSNY must mobilize a citywide network of local organizations, elected officials, Community Boards in order to increase awareness and education about recycling, as well as door-to-door neighborhood multilingual canvassing. (NYLCV)

The Draft 2026 plan presents some promising areas of focus for expanding local composting access and organics waste recovery but, there are some areas of concern. We agree with the proposal to expand the number of composting facilities which should include mid- and large-size aerobic composting facilities across the five boroughs as this would lead to a significant reduction in miles traveled by trucks transporting source-separated organic waste and expand organics collection and processing. DSNY should consider environmental justice factors in the process and engage local residents in its decision for siting these facilities. The current plan does not clearly indicate how the stakeholder process will deeply engage community members or how they will be incorporated into the decision making process for citing new facilities. In its efforts to support community composting, we agree in the need to provide funding to community composting groups as they are not only active in the collection and/or processing of organic waste but are vital in deepening the public education efforts in communities, providing finished compost products and supporting neighborhood revitalization. (TDT)

Comment 250. DSNY should work with [the Department of Consumer and Worker Protection] to improve outreach and education efforts for businesses, third party delivery apps, and customers [on plastic utensils, extra containers, napkins, and condiment packets]. (NYLCV)

Response 250. DSNY will consider your suggestion as part of **Initiative 1.3**, reduce packaging and single-use items and encourage reuse. Strategies under this initiative include: promote at least one pilot of reusable packaging with a New York City partner (**Strategy 10**), promote a container reuse program at a public venue (**Strategy 11**), and expand single-use plastic waste reduction and other waste reduction initiatives in schools and other educational institutions (**Strategy 12**).

Comment 251. Training community groups on DSNY services and talking points is a good tactic to empower them to be better “ambassadors” of DSNY programs. How many groups and trainings can DSNY conduct with existing staff, as DSNY states in the plan that no additional staff is needed? (Allen)

Education initiatives must be rolled out in collaboration with relevant stakeholders in balance with cultural and multi-demographic sensitivity. Education initiatives must be well-funded, well-resourced and well understood by collaborators and citizens. (Coyne)

Work with community organizations for education and outreach for tangible learning opportunities wherever possible—community compost organizations and repair organizations etc. (CZWD)

Response 251. DSNY will collaborate with communities, community groups and organizations, and other stakeholders to implement *SWMP26* programs to reduce waste generation and divert materials from disposal. *SWMP26* includes the following strategies, among others, that include collaboration with stakeholders to promote waste reduction, diversion, and outreach and education:

Strategy 7: Support agencies, residents, nonprofits, and community organizations to engage in reuse and repair by offering technical assistance, strategic relationship development, and access to funding and donation opportunities.

Strategy 19: Convene a network of organizations across sectors in the circular economy.

Strategy 20: Develop a virtual hub to increase coordination, compile research, collect data, and share best practices.

Strategy 22: Partner with local organizations to promote commercial C&D material reuse.

Strategy 51: Manage available funding for community composting groups and botanical gardens in the city and collaborate on outreach and education.

Strategy 100: Convene construction industry stakeholders to identify and address barriers to reuse, recycling, and beneficial use, and to improve C&D materials data.

Strategy 113: Identify outreach opportunities with local elected officials and community-based organizations.

Enforcement and Incentives

Comment 252. Summary: DSNY’s programs and regulations require stronger and more consistent enforcement efforts, both overall and specifically regarding illegal dumping, environmental justice, containerization, and previously suspended fines for organics separation. These enforcement efforts should prioritize businesses and large waste generators.

Response 252. DSNY agrees that enforcement is important. *SWMP26* includes **Initiative 8.4**, leverage enforcement efforts as a form of education and outreach.

Detailed Comments

Enforcement efforts, particularly for commercial waste generators, must be consistent, ongoing, and well-funded. (Coyne)

Our community in Southeast Queens has been heavily impacted by the proliferation of waste transfer stations, which are in close proximity to residents' homes. This is particularly evident along Liberty Avenue, between 165th Street and 180th Street in Jamaica, and on Hollis Avenue off of Jamaica Avenue. These facilities are all located in M1 zones, where businesses are designed to coexist easily with residences that abut these zones. These waste transfer stations dealing in putrescible waste and construction and demolition waste create noxious fumes and dangerous particulate matter which has contributed to elevated levels of respiratory illnesses and other health hazards. The commercial waste zone and waste equity legislative initiatives are supposed to provide relief for our residents. But the issue has always been, and remains, the lack of effective enforcement of these and existing statutes by agencies such as the Department of Sanitation and New York State Department of Environmental Conservation ... And, there have been regulations in the past that were supposed to allow waste transfer stations and other higher-use group industries to coexist in M1 zones, because they were supposed to adhere to certain performance standards. The problem is that the agencies that were supposed to enforce the performance standards don't do so. And so, what you have is these industries that are acting in very derelict and noxious ways, and have severely impacted the residents that are forced to live close to them. (SQREJC)

The problem has always been the lack of enforcement. The commercial waste zone law, the waste equity, all of those require that the various agencies actually enforce them. (SQREJC)

Vague and unenforced regulation has made accountability between redemption centers and distributors almost impossible ... many types of containers are arbitrarily excluded from the system, creating needless confusion and inconsistency, not to mention increasing litter. Coca-Cola can sell a tea beverage and a soda beverage in the exact same container—same size, same shape, same material—and the soda is redeemable but the tea is not. It simply doesn't make sense. All this combines to hamper the system's efficacy, put more trash on the streets, depress small businesses, and keep independent recycling entrepreneurs trapped on the margins. These consequences are visible across the state, but are particularly dire here in the city. (Sure We Can)

[Uplifting "A People's SWMP,"] 2026 SWMP must commit the Department of Sanitation to implementing robust public education strategies around programs and ensuring stronger enforcement of recycling laws. (ICC)

We are concerned by the lack of enforcement of recycling rules under the previous administration. Following the rollout of citywide curbside organics collection in 2024, the amount of source-separated residential organics collected by DSNY increased after the City began issuing fines to non-compliant buildings and then decreased significantly after the Adams Administration ordered DSNY to suspend most enforcement of these recycling laws in April 2025. We encourage DSNY to detail a targeted and progressive approach to recycling and organics enforcement, beginning with the largest generators in violation of source-separation rules, such as large residential and commercial buildings, large food markets and grocery stores, large restaurants and cafeterias, and

corporate chains. We are supportive of the Draft SWMP's framing of recycling law enforcement as an educational opportunity, and the proposal of on-the-ground neighborhood walk-throughs with community leaders and elected officials to identify issues and target enforcement efforts. (NYLPI)

Enforcement should be consistent, ongoing and well-funded. This relates to businesses and residents. There are illegal dumping problems in parts of our communities and in many other areas of the city. Some people and questionable businesses dump their recyclables, along with putrescible garbage, furniture, and construction waste. With containerization and composting, there have been starts and stops regarding enforcement. (Queens Community Board 5)

There is no point in attempting to implement any plan without proper education of the community. Public awareness and understanding are critical to ensuring compliance and long-term effectiveness ... there is no point in implementing any plan if it is not supported by consistent and meaningful enforcement. I believe it is necessary to reinforce the enforcement of existing regulations, which has diminished in recent years. Strengthening enforcement, alongside community education, will be key to achieving the goals of *SWMP26*. (Torrano)

Comment 253. I think it's imperative to figure out a way to incentivize landlords to participate and offer [a textile recycling] program to renters. I am fortunate enough to own my apartment now, but I spent 15 years renting before this, and I can tell you that I can think of maybe one landlord who might have considered it, but most of them wouldn't listen to a resident who was asking for the building to be enrolled in an opt-in program like [RefashionNYC]. I doubt they would have even returned my call, frankly. So I think if we're really going to make an impact on diverting these materials from landfills, we have to find a way to work with landlords to make sure that renters can participate as well. (Callahan)

Response 253. Your suggestion will be considered in implementing **Initiative 1.1**, advance textile reuse programs and reduce textile waste. DSNY will establish textile collection options for all city households and institutions, with additional events and appointment-based pickup for low-rise buildings (**Strategy 1**) and study potential legislation to increase participation (**Strategy 2**).

Comment 254. NYC has a sophisticated recycling infrastructure, and yet, the recycling capture rate is less than 20%. With curbside composting, the participation rate remains low,¹⁴⁹ but there should be a 90% participation rate, given that it is being collected on recycling days.¹⁵⁰ As such, the DSNY must begin meaningfully enforcing NYC's existing waste diversion laws, such as mandatory curbside composting and recycling laws. The DSNY's failure to enforce these laws is resulting in increased waste sent to the incinerator that can and should be diverted. (ICC)

[Suggested] Strategy: Change "increase participation in the residential curbside collection program" to "increase participation in the residential curbside collection program by ensuring compliance from property owners and pursuing enforcement mechanisms" ... With significant notice and grace periods before enforcement,¹⁵¹ the Mayor's recent decision to push back fines for non-compliance with curbside organics recycling is a disappointing decision that does not align with the proposed NYC SWMP. The DSNY *SWMP 2026* strategy to "increase participation in the residential curbside collection program" cannot be achieved without enforcing their own regulations. By waiting until 2026 to fine for non-compliance, thousands of New York City residents lack the power to push

landlords to participate in curbside organics collection, ultimately reducing the impact of this law. (EANY)

According to DSNY's *2023 Waste Characterization Study*,¹⁵² "Much of what could be recycled was not separated for recycling. Additionally, the study stated that metal, glass, plastic, and paper recycling outcomes have declined from previous study years; capture rates have decreased, while contamination rates have increased. It's clear that New York City Still has a long way to go when it comes to recycling rates and enforcement. (NYLCV)

Response 254. As reported in the *2023 Waste Characterization Study*, the residential capture rate for some recyclables is approaching 50%, which is impressive for a city as large and dense as New York City. At the same time, continuing to increase recycling capture rates is a priority for DSNY. **Strategies 122-124** outline ways that DSNY can leverage enforcement efforts as a form of education and outreach: conduct neighborhood walkthroughs with community partners and elected officials to observe area conditions and apply targeted outreach; allow warning periods for new initiatives and issue verbal and written "warning tickets" that provide notice of rules and regulations and ways to avoid a fine in the future; and post collection laws and associated fines for businesses, residents, agencies, and institutions on the DSNY website.

Comment 255. Summary: Illegal dumping is an ongoing problem creating unsanitary conditions and flood risks. *SWMP26* should include the installation of more cameras in areas that attract illegal dumping and strengthen other initiatives to deter and punish illegal dumping, and vacant lots should be cleaned of illegally dumped waste.

Response 255. Anti-dumping initiatives are enacted by DSNY to ensure that communities remain clean and that waste is handled properly. Enforcement programs related to dumping include community-centric initiatives such as the Illegal Dumping Award Program and the Illegal Dumping Tip Program. *SWMP26 Strategies 122* and *124* outline ways that DSNY can leverage enforcement and education to increase compliance. **Strategy 122** is to conduct neighborhood walkthroughs with community partners and elected officials to observe area conditions and apply targeted outreach; **Strategy 126** is to post collection laws and associated fines for businesses, residents, agencies, and institutions on the DSNY website. Your specific suggestions for enforcement and common dumping areas are appreciated and will help inform program implementation. DSNY has more than 330 cameras in active use today and has issued a significant number of NOVs (notices of violation) associated with those cameras (see **Table 4**).

Table 4. Increase in Enforcement with Camera Installations

Camera Enforcement	CY 2024	CY 2025	% Increase CY 2024-CY25
Number of Impounds	275	445	62%
Number of Summonses	360	537	49%

Detailed Comments

Illegal garbage dumping has become a permanent job for some and an eyesore for others in our St. Albans Community. What can we do to make this problem go away ... Our neighbors continue

to file complaints with 311 regarding garbage dumping only to be told that it has to be a bathtub full before they can send a truck out to pick it up. Garbage is picked up twice a week in our community. Dumping occurs frequently especially under the overpass of the Long Island Railroad, located on 120th Avenue between 180th Street and Farmers Blvd. This is a regular garbage pick-up route with residential homes on 120th Avenue. Why wait for the dumping to become a bathtub size before it can be picked up ... We are also troubled with people dumping garbage in front of the community driveways in our neighborhood. Because there are no addresses where the garbage is being dumped, we are told by the sanitation drivers, that they are not allowed to pick up garbage that's not in front of an address. However, the homeowner of that corner property where the garbage is being dumped, has been cited several times for not removing the dumping on the side of their house near the community drive located on (180th Street Between Anderson & Zoller Rds.) This is a regular garbage route ... Can sanitation workers pickup dumped garbage on regular pick-up days and on garbage routs. This would avoid bathtub size dumped garbage from littering the streets and neighborhoods, that can cause flooding. Is this a union problem for DSNY? (TONA)

... Garbage dumping is getting worse and not being addressed by the leadership (politicians) as it should. 311 calls and complaints are left up to the community neighbors ... Do the city have a sanitation code enforcement unit. If so, why can't the sanitation code enforcement unit report illegal dumping when they see it. Must it always be left up to the neighbors/taxpayers to report this dumping problem. Is this the same unit that issues summons to homeowners for not complying with the sanitation codes? Please help us to understand the difference. Can cameras be installed under the overpass of the LIRR? Would this be the responsibility of the LIRR Administration, or can they work with DSNY to fix dumping problems? (TONA)

Dumping also causes flooding conditions when garbage flows into the catch basins and sewers. Southeast Queens has a very high water table, and flooding is an ongoing problem in our community. (TONA)

Complaint #311-2231, dated March 21, 2025—a vacant lot property owned by the City of New York, located on 180th St. (126-13 180th St.) was never addressed. Abandoned trucks filled with garbage and rodents seen scurrying in the lot is still an ongoing problem that's getting worse. We were told that this complaint would be investigated in (75) days. This is the 7th Month. We called 311 for an update and were told that the complaint is still open. Why can't the sanitation police and NYPD work together to remove these abandoned cars and trucks parked on the vacant lot? This lot at the above location is city property. (TONA)

There needs to be more consistent monitoring and pickup in areas that attract dumping activity. These include vacant lots and, in my community, areas on the outskirts of the wetland areas. Cameras and fines can help with enforcement of dumping laws. (Boyce-Charles)

Additionally, we have issues of persistent illegal dumping, especially under the Long Island Railroad overpasses at Merrick Boulevard, 177th Street and 183rd Street between Liberty Avenue and Arthur Avenue / 193rd Avenue. I would urge QSWAP to advocate for additional attention to these locations, including installing cameras under the overpasses to catch and punish dumpers. (SQREJC)

Program Evaluation

Comment 256. How are programs and tactics evaluated and can DSNY share these evaluations so we can learn what is effective or not? More data should be added related to orders for online materials, participation in online and in person trainings, and any and all other [outreach and education] efforts conducted by DSNY and contracted vendors. (Allen)

What data has been collected from door to door canvassing, and what are the key learnings from this outreach that could guide future efforts and outreach? On page 172, the plan seems to outline stronger tactics for outreach for CWZ. Were these same tactics used to promote curbside “composting”? What was most effective and what did DSNY hear while canvassing? What does canvassing cost? DSNY enforcement is being utilized for [outreach and education], what was learned from these efforts that can be included and detailed in the plan? How are learnings being shared from building to building? Can DSNY provide case studies recapping successes of this outreach? (Allen)

Response 256. DSNY provides extensive information regarding its activities in multiple reports accessible on DSNY’s website, including the Fiscal Year Zero Waste Report, the biennial Solid Waste Management Plan reports, the Commercial Waste Zone annual report, and others. In addition, metrics on DSNY’s performance are included in the Mayor’s Management Report as well as a number of Open Data sets.

One of the most salient outcomes from canvassing was DSNY’s support for mandatory citywide composting. From 2022 to 2025, DSNY knocked on close to 800,000 doors to educate residents about the Citywide Residential Organics Program. The current curbside program is consistent, inclusive, and accessible and has yielded the best results of any organics diversion program New York City has ever had.

Targeted Education and Outreach

Comment 257. Summary: SWMP26 Education and Outreach Program should prioritize working with schools to teach students (and, by extension, their families and communities) the value of waste reduction and a circular economy and to reduce contamination in waste collected from schools.

Response 257. DSNY will continue to provide waste sorting education and training to school students and their families (**Strategy 115**). DSNY will also ensure continuity in training and education to increase participation in the school curbside organics collection program (**Strategy 28**) and expand single-use plastic waste reduction and other waste reduction initiatives in schools and other educational institutions (**Strategy 12**). DSNY will consider your suggestions on enhancing education programming as part of the Education and Outreach Program. **Initiative 8.1**, under the Education and Outreach Program, is to increase diversion and reduce contamination in all recycling streams. This work will include organics. SWMP26 includes a discussion of contamination. See **Chapter 5, Initiatives 2.1, 2.2, 3.4, and 8.1**. Additional information specific to schools is available in the *2023 Waste Characterization Study*, which is referenced throughout SWMP26.

Per SWMP26 **Strategy 28**, outreach and education are critical to robust and consistent participation from schools and are a core focus of NYCPS’ waste operations. Schools receive

equipment, signage, and in-school support. Training continues to be provided to all building staff (e.g., custodians and food service) as well as events, workshops, resources, and grants for other school staff (e.g., teachers and administrators) on an ongoing basis. Staff and students are responsible for sorting, and staff leadership is responsible for implementing a system that works for their school.

NYCPS is committed to offering options for student and staff engagement. Such initiatives as the citywide waste reduction-themed Climate Action Days and Plastic Free Lunch Days help raise awareness and commitment from schools. Key goals to cultivate and increase student leadership have established channels of engagement that include Youth Leadership Councils, annual Youth Climate Summits, and other student-focused events to connect waste reduction to climate action and impact.

Detailed Comments

This plan speaks of education and outreach, but those who attend library and small independent mending classes aren't representative of NYers who think it's ok putting their textiles and shoes in the trash. Participation doesn't increase with a postcard. We need to create excitement and showcase what is possible when we reconsider viewing used textiles as source material for creating new, useful, and beautiful item. We need to return to teaching such practical skill sets to every student. This most certainly should be part of STEAM programs where science, technology, engineering, art, and math would be combined into curriculum teaching students collaboration on the application of interdisciplinary systems needed to address waste and multifaceted societal problems. Developing such a curriculum needs budgets. Developing similar programs with immigrants, seniors, and incarcerated need budgets. This also creates jobs and entrepreneurial opportunities in the circular economy. (Silbermann)

Not addressed in the plan is the high contamination rate of recyclables and compostable food waste in New York City public schools. This points to the need for scaled-up education and behavior-change communication with students. Given that children and young people bring what they learn home to their families and communities, outreach and education in schools can magnify impact. Younger generations are also more concerned about climate and the environment,¹⁵³ providing strong motivation to support school-based initiatives. (Cocco-Klein)

It is well known that many DSNY organics collections are highly contaminated, particularly those from schools. This fact, as acknowledged in the plan, is a significant problem—and were DSNY to undertake adequately scaled outreach and education, contamination reduction would be a major behavioral goal. (MacBride)

Comment 258. Restart education of supers and peer-to-peer training. (CZWD)

Education/training: I've yet to see plastic and/or paper recycling and composting done correctly at my apartment building ... Better training needs to be continually evaluated and offered. Superintendents sometimes even leaf blow their sidewalks into the street, sending waste along with the leaves and dust/dirt/animal droppings into the faces of passers-by. (Gorman)

Response 258. DSNY will consider your suggestions, particularly in implementation of **Strategy 111**, to offer online information sessions, training on new programs, and technical assistance on DSNY rules and regulations to building management and staff. DSNY currently provides training for residential

buildings and City agencies through the Clean Buildings Training,¹⁵⁴ as discussed in *SWMP26 Chapter 5: Program Development*.

Comment 259. Summary: Targeted education and outreach programs, coupled with enforcement, should be developed for specific resident and stakeholder groups, including residents and owners in the new Brooklyn waterfront developments, Sanitation Districts with high overconsumption rates, and noncompliant residential homes and buildings.

Response 259. DSNY appreciates your recommendations for targeted education and outreach and will consider them as part of Education and Outreach Program implementation. Strategies under this program that provide opportunities for tailored outreach include **Strategy 113** (identify outreach opportunities with local elected officials and community-based organizations), **Strategy 114** (conduct door-to-door neighborhood canvassing for new initiatives or in areas with low compliance with waste management regulations), and **Strategy 122** (conduct neighborhood walkthroughs with community partners and elected officials to observe area conditions and apply targeted outreach). DSNY also agrees that consumption is a driver of waste generation, which is why the first *SWMP26* program is “Waste Prevention and Reuse,” which includes repair and reuse initiatives that serve as a mechanism to avoid waste generation.

Detailed Comments

Suggestions to increase organic diversion in the new Brooklyn waterfront developments being planned by the New York City Economic Development Corporation (NYCEDC): Explain to residents in the outreach meetings how decisions they make will impact waste collection operations. DSNY should have a representative familiar with the Sanitation District (Bk 6 or & 7 in this case) in the community outreach phase of any waterfront development plan. Few residents are aware of the technologies available for separation of waste, especially organic waste. (Garcia)

Educating and promoting reduced overconsumption: District 7 (Upper West Side) is the second-highest exporter of waste in volume. However, it is the highest participating district in organics diversion, paper, and metal/glass/plastic recycling, so there is a major opportunity for overconsumption education. (ICC)

A natural and logical consequence is that DSNY must concentrate outreach and education efforts, in conjunction with enforcement, on the residential population in sustained, intensive, and creative ways capable of changing behavior at a materially significant scale. (MacBride)

... concerted outreach and education effort should be conducted to reach those [multi-unit] buildings—and single-family homes—that are not currently separating their organics or their paper, cardboard, metal, glass, and plastic. And this should be coupled with enforcement so that buildings that do not comply get warnings and eventually fines. (Latham)

Comment 260. NYFWAN recommends that DSNY establish dedicated education and outreach campaigns targeting both potential [donateNYC Food Portal] donors and recipient organizations. For local food businesses, education campaigns should provide information on legal protections and liability shields for food donors, highlight the environmental and financial benefits of donation, and offer practical guidance on how to use the donateNYC Food Portal. For food pantries, food banks, and

food rescue organizations, DSNY should conduct outreach to raise awareness of the Portal's functionality and to facilitate registration and participation. (NYFWAN)

Response 260. DSNY will consider these suggestions as part of the Education and Outreach Program, and **Initiative 2.5**, promote food donation and rescue.

Comment 261. Require Boating Safety Certificates courses to have a section on marine waste separation for onshore disposal in New York City marinas. In New York State, if you were born on or after May 1, 1996, you are required by New York State Law to successfully complete a state approved course and obtain a boating safety certificate to operate a motorboat. The course could include a module on offshore separation by boater for on-shore disposal. (Garcia)

Response 261. While DSNY appreciates this recommendation, it is beyond DSNY's purview and the scope of the SWMP.

Comment 262. A lot of the dumping may come from residents who are completing DIY projects, and who don't know how to responsibly dispose of the waste that results. DSNY can provide education around options for economical and practical ways to dispose of this waste. Perhaps they can provide the public with lists of local solid waste management vendors who could support responsible disposal practices at reasonable prices. (Boyce-Charles)

Response 262. DSNY will create multilingual outreach materials for all waste programs and share them on DSNY's website, via social media, and by mail (**Strategy 110**), in addition to maintaining and modernizing the "How to Get Rid of" search tool, Smart Composting Bin app, and donateNYC platform (**Strategy 118**). DSNY will also work with industry, C&D waste processors, and City agencies to develop C&D material reuse incentives (**Strategy 101**).

Strategy Recommendations

Comment 263. A lot of the dumping may come from residents who are completing DIY projects and who don't know how to responsibly dispose of the waste that results. DSNY can provide education around options for economical and practical ways to dispose of this waste. Perhaps they can provide the public with lists of local solid waste management vendors who could support responsible disposal practices at reasonable prices. (Boyce-Charles)

Response 263. DSNY will create multilingual outreach materials for all waste programs and share them on DSNY's website, via social media, and by mail (**Strategy 110**). DSNY will also maintain and modernize the "How to Get Rid of" search tool, Smart Composting Bin app, and donateNYC platform (**Strategy 118**). Additionally, DSNY will work with industry, C&D waste processors, and City agencies to develop C&D material reuse incentives (**Strategy 101**).

Comment 264. Work with a few multifamily buildings in each borough, of different building types and income levels and demographics. Pilot different engagement and education methods and see which are most successful, then apply elsewhere. (CZWD)

Issue an RFP for a consultant to redesign and cost-out a top-level, multi-media education and outreach program, including brochures and mailings, social media ads and influencers, celebrity endorsers, subway and bus advertising, in-person visits to multi-story buildings, vigorous but reasonable enforcement, etc. (NRDC)

Response 264. DSNY will consider your suggestion when implementing strategies under the Education and Outreach Program.

Waste Transport

Comment 265. We hope DSNY continues to work towards transitioning to zero-emission vehicles for DSNY and commercial sanitation trucks. (NYLCV)

NYLCV urges DSNY to continue working towards transitioning to zero-emission vehicles for DSNY and commercial sanitation trucks. Additionally, the City must continue working with DCAS, utility companies, and industry professionals to ensure adequate charging infrastructure is installed and available for sanitation trucks. (NYLCV) Give extra consideration for CWZ carters with the most aggressive plans to [transition to zero-emission sanitation vehicles]. (NYLCV)

Response 265. As of May 2024, DSNY operated 791 various alternative fuel vehicles, including electric and hybrid electric vehicles. <https://www.nyc.gov/assets/dcas/downloads/pdf/fleet/nyc-dcas-clean-fleet-update-report-2024.pdf>

DSNY is transitioning its collection and department vehicle fleet to electric by 2040 in accordance with Executive Order 53 (2020). In the fall of 2022, DCAS released the Clean Fleet Transition Plan. DSNY will continue to participate in research and development of new technologies and to evaluate the mechanical reliability and operability of alternative fuel collection trucks to assess their respective environmental and economic performances. DSNY will also continue to assess its facilities, build EV infrastructure, and work with DCAS and local utilities to receive the necessary funding and service level upgrades to support this major endeavor.

Comment 266. AMP encourages the DSNY to explore the use of the city's existing transfer stations for advanced MSW sortation infrastructure to recover the recyclables left in New York City's MSW, diverting the volumes of waste disposed of out of state or upstate in landfills and WTE facilities ... [and] reduce greenhouse gas emissions ... Technologies in use today are capable of diverting up to 60% of MSW destined for landfill or waste-to-energy, recovering valuable recyclables and organic waste. (AMP)

Response 266. DSNY is prioritizing improvements at MGP transfer stations and sorting facilities, along with market development, to increase the recovery of materials. DSNY will continue to proactively monitor MSW disposal capacity in the regional market, new sortation and recycling technologies, and novel opportunities for beneficial use and incorporate innovations into long-term planning efforts (**Strategy 70**).

Comment 267. I am going to describe to you some of the health and environmental harms that are being dumped on Queens residents by private companies profiting from waste export by rail. The 1970's locomotive technology that is generally being used to haul freight rail in NYC is actually a source of

pollution. These old locomotives pollute the air our families breathe with thousands of times more pollution than locomotives that meet Tier 4 emissions standards, which has been the US EPA standard for locomotives since 2015. ... The Port Authority of New York-New Jersey repowered three Tier 0 NYNJ Rail freight locomotives working in Greenville Yard in NJ to Tier 4 emissions in 2015. And there is one Tier 4 freight locomotive hauling waste in NYC, the one Waste Management purchased in 2018, for picking up and hauling away waste from its Varick and Review Avenue transfer stations. The modern engines in these Tier 4 locomotives are quieter, as well as being near zero emissions. However, it takes more than one locomotive to haul a train. Toxic diesel fumes and nighttime noise from waste-by-rail are health hazards in Queens because locomotives operate in and near residential areas. (CURES)

Chapter 5, page 165 mentions transportation requirement "exemptions for C&D," with no acknowledgment that New York State law now mandates containment of waste-by-rail, including for C&D. However, waste disposal companies are still shipping and railroads are still hauling toxic loads of C&D without solid covers, in defiance of this law.¹⁵⁵ (CURES)

Cover rail cars, with the realization that shipping industrial waste, like C&D, automotive waste, and incinerator ash is not safe in leaking rail cars exposed to rain, snow, and wind. (CURES)

More than a third of the New York & Atlantic Railway's freight rail business on Long Island—including Queens and Brooklyn—is Municipal Solid Waste and C&D. As DSNY points out, the C&D that is being hauled is industrial waste and it is presumed to contain toxics. State law requires that C&D must be tested before it can be reused instead of being landfilled. Yet every day in NYC open top rail cars of C&D that also have drains in the bottom of the cars emit waste blowoff, leachate, and gas in residential areas. (CURES)

Response 267. Neither DSNY nor NYC has jurisdiction over railroads; however, DSNY believes that the programs of *SWMP26*, including waste diversion and circular economy goals to reuse and recycle materials locally, can reduce the amount of waste requiring export and the associated impacts. As part of the *2006 SWMP*, DSNY committed to full containerization of waste exported by rail for all facilities that manage waste on behalf of New York City residents and agencies. Information on the freight locomotive repowering project that CURES advocated for and that was completed as part of the EPA Ports Initiative is available on the EPA website: <https://www.epa.gov/ports-initiative/new-york-city-locomotive-repowers-collaborative-efforts-improve-air-quality>. Information about EPA strategies to reduce air pollution from locomotives is available at <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P101608H.pdf>.

Comment 268. There is only one 10-acre railyard where all the rail freight coming on and off Long Island is switched, and it's located in Glendale, Queens. So rail cars are stored on tracks in neighborhoods. As DSNY correctly points out in the draft *SWMP*, the IBX, if built, will cut down on tracks available to freight rail, including on the Bay Ridge line, where some rail cars are stored today. Rail cars are 65 to 75 feet long. If the IBX takes a track on the Bay Ridge that will mean even more rail cars will be stored on tracks in neighborhoods. And when they are moved, including at night, the problems just described will adversely impact residents. (CURES)

Response 268. As *SWMP26* is a planning document, DSNY included this information for planning purposes. As part of any major infrastructure project, opportunities for stakeholder and public input on potential impacts are part of the process. DSNY will continue to monitor the progress of the IBX project. The

scoping document for the IBX project is available on the MTA website at <https://www.mta.info/document/187036>.

Comment 269. The SWMP should also set a timeline for DSNY and the Business Integrity Commission (BIC) to require private construction and demolition (non-putrescible) waste trucks to report GPS data, enabling the City and the public to assess the efficiency, safety, and environmental impact of the huge non-putrescible waste sector. (TDT)

Response 269. DEC regulates New York C&D haulers and facilities. While DEC does not currently require VMT tracking, 6 NYCRR Part 360 was updated in 2023 to require waste transporters to fill out waste tracking documents for every shipment of waste (including C&D and fill) and submit this information to DEC. This data can support future analyses.

Endnotes

- 1 DSNY, Public Meeting, October 27 recording: <https://www.youtube.com/watch?v=86FeZEQgZKg>
- 2 DSNY, Public Meeting, October 27, presentation: <https://www.nyc.gov/assets/dsny/downloads/resources/reports/solid-waste-management/2026-swmp/swmp-2026-public-meeting-presentation-102725.pdf>
- 3 N.Y.C., Local Law No. 86 § 1 (2023), <https://intro.nyc.gov/local-laws/2023-86>
- 4 <https://www.unep.org/resources/global-waste-management-outlook-2024>,
- 5 Transform Don't Trash Coalition, *A People's SWMP*, <https://www.nylpi.org/wp-content/uploads/2025/10/A-Peoples-SWMP-Report.pdf>
- 6 DSNY, Zero Waste Plan, <https://www.nyc.gov/assets/dsny/downloads/resources/reports/zero-waste-plan/zero-waste-plan.pdf>
- 7 European Parliament Research Service, <https://www.europarl.europa.eu/topics/en/article/20151201STO05603/circular-economy-definition-importance-and-benefits>
- 8 <https://www.nyc.gov/assets/climate/downloads/pdfs/PlaNYC-2023-Full-Report.pdf>
- 9 EDC, Green Economy Action Plan, (2024). <https://edc.nyc/sites/default/files/2024-06/NYCEDC-Green-Economy-Action-Plan-05-31-2024.pdf>
- 10 NYC Office of Community Hiring: <https://www.nyc.gov/site/communityhiring/about/about.page>
- 11 Landfills are the third largest source of climate-damaging methane emissions, see National Public Radio, *Scientists Say Landfills Release More Planet-Warming Methane than Previously Thought* (Aug. 11, 2022), waste incineration is acutely climate-damaging, see Zero Waste Europe, *The Impact of Waste-to-Energy Incineration on Climate* (Sept. 2019), the climate impact of the single-use plastics filling our trash bins is on track to surpass that of coal-fired power plants, see Beyond Plastics, *The New Coal: Plastics and Climate Change* (Oct. 2021), and overall, more than 40% of climate-damaging emissions are linked to the production, use, and disposal of goods, see U.S.
- 12 Nationwide, 79% of trash incinerators are in or near environmental justice communities, including communities of color and low-income communities, see Ana Isabel Baptista et al., *The New School, U.S. Municipal Solid Waste Incinerators: An Industry in Decline*, at 15 (May 2019), and 51% of municipal solid waste landfills, including 58% of the 50 largest landfills, are in or near environmental justice communities, see Kevin Budris, *Just Zero, Landfills and Injustice: The State of Burying Trash in the United States*, at 7 (Feb. 2025).
- 13 According to the New York City Department of Sanitation, New York City spent approximately \$1.75 billion on trash collection and disposal in 2024. See DSNY, *Draft SWMP26*, at 109.
- 14 Waste management jobs were the fourth deadliest jobs in the U.S. in 2023. See Cole Rosengren, *Waste Dive, Waste and Recycling Collection Was Fourth Deadliest Occupation in 2023* (Dec. 19, 2024).
- 15 The Zero Waste International Alliance defines Zero Waste as the “conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health.” Zero Waste International Alliance, *Zero Waste Definition*, <https://zwia.org/zero-waste-definition/>.
- 16 <https://www.wired.com/story/scientists-thought-parkinsons-was-in-our-genes-it-might-be-in-the-water/>
<https://www.washingtonpost.com/climate-environment/2026/01/04/microplastics-science-discoveries/>
- 17 New York State Codes, Rules and Regulations, Subpart 366-3. LSWMP Public Participation <https://dec.ny.gov/sites/default/files/2024-10/part360fulltextadopt.pdf>
- 18 Plastic Free Lunch Days, <https://www.schools.nyc.gov/school-life/space-and-facilities/sustainability#:~:text=Plastic%20Free%20Lunch%20Day,items%20like%20utensils%20by%20request>
- 19 Right to Refill, <https://www.nysenate.gov/legislation/bills/2023/A4673>
- 20 DSNY, *Draft SWMP26* (October 2025), p. 125
- 21 Laura Parker, *Fast Facts About Plastic Pollution*, National Geographic. (Dec. 20, 2018), <https://www.nationalgeographic.com/science/article/plastics-facts-infographics-ocean-pollution>
- 22 Greenpeace, *Circular Claims Fall Flat Again*, at 3 (Oct. 24, 2022), https://storage.googleapis.com/planet4-usa-stateless/2024/11/7287b658-gpus_finalreport_2022.pdf
- 23 16 C.F.R. §260.12 The Federal Trade Commission's Guides for the Use of Environmental Marketing Claim, commonly known as the “Green Guides” states that a company can only make unqualified claims about the recyclability of a product or packaging if recycling facilities that can manage the product or packaging are

- available to at least 60% of consumers. Importantly, the federal requirements do not look into whether the materials sent to these recycling facilities are actually used to make new consumer products.
- 24 <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6632263&GUID=F09F0A4F-EFBC-4FD7-8A12-8391D10CB0D8&Options=ID|Text|&Search=741-2024>
- 25 New York City Council, Intro 1003-2023, <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6165443&GUID=B6D03540-836C-4352-965C-B3A58E16A0C1&Options=ID|Text|&Search=1003>
- 26 Sandee LaMotte, CNN, *Chemicals Linked to Breast Cancer Leach into Our Foods, Study Finds* (Sept. 24, 2024).
- 27 Pien Huang, NPR, *Chemicals from Food Packaging Leach into Food – Affecting People’s Health* (Sept. 19, 2024), <https://www.npr.org/2024/09/19/nx-s1-5116541/chemicals-from-food-packaging-leach-into-food-affecting-peoples-health>
- 28 Bailee Henderson, Food Safety Magazine, *High Levels of Toxic Plasticizers Phthalates, Bisphenols, Found in Nearly All Foods in U.S.* (Jan. 5, 2024): <https://www.food-safety.com/articles/9146-high-levels-of-toxic-plasticizers-phthalates-bisphenols-found-in-nearly-all-foods-in-us>
- 29 <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=7157603&GUID=EC95D71C-049C-4DB7-90E7-4A00BBC05342>
- 30 DSNY, *Draft SWMP26* (October 2025), p. 122
- 31 DSNY, *Draft SWMP26* (October 2025), p. 120-122
- 32 City Planning Commission, *City of Yes for Carbon Neutrality*, Zoning Resolution amendment, <http://www1.nyc.gov/assets/planning/download/pdf/about/cpc/230113.pdf>
- 33 Community Hiring Initiative: <https://www.nyc.gov/site/communityhiring/about/about.page>
- 34 Office of the Brooklyn Borough President et al., *Expanding Composting in New York City: The Case for Passing and Implementing Intro-0696-2024* (2025): https://www.brooklynbp.nyc.gov/reports/#flipbook-df_82427/3/
- 35 *A People’s SWMP*, <https://www.nylpi.org/wp-content/uploads/2025/10/A-Peoples-SWMP-Report.pdf>
- 36 NYCHA, <https://www.nyc.gov/site/nycha/about/developments.page>
- 37 NY Community Compost Network: <https://nyccommunitycompostnetwork.org/>
- 38 MOCEJ, Zero Waste Challenge: <https://www.nyc.gov/site/sustainability/initiatives/zero-waste-challenge.page>
- 39 Local Law 57 of 2021, <https://www.nyc.gov/assets/dsny/downloads/services/agencies-nonprofits/food-waste-prevention-plan-template-2022.pdf>
- 40 *Newtown Creek Plant Burns Off Valuable Methane Daily as Waste Recycle Project Lags*, <https://www.thecity.nyc/2022/04/15/newtown-creek-plant-burns-methane-waste-recycle-lags/#:~:text=The%20same%20document%20showed%20that,to%20your%20inbox%20each%20morning.>
- 41 DSNY, *Draft SWMP26* (October 2025), p. 132.
- 42 D.P. Moore et al., *Environmental Science & Technology*, *Underestimation of sector-wide methane emissions from United States Wastewater treatment*, 57(10), 4082-4090.
- 43 MOCEJ, PlaNYC: Getting Sustainability Done, https://www.nyc.gov/assets/climate/downloads/pdfs/PlaNYC_Progress_Report_2025.pdf
- 44 Richard, T. L., & Woodbury, P. B. (2025). *Municipal Solid Waste Composting Fact Sheet Series - Strategies for Separating Contaminants*. Cornell.edu. <https://compost.css.cornell.edu/MSWFactSheets/msw.fs3.html>
- 45 Thakali, A., McRae, J. D., Isehour, C., & Blackmer, T. (2022). *Composition and contamination of source separated food waste from different sources and regulatory environments*. *Journal of Environmental Management*, 314, 115043. <https://doi.org/10.1016/j.jenvman.2022.115043>
- 46 NYC DEP Energy and Carbon Neutrality (ECN) Plan, *Biosolids Beneficial Use Plan 2020-2030*, <https://www.nyc.gov/assets/dep/downloads/pdf/water/wastewater/biosolids-beneficial-use-plan.pdf>
- 47 93: SWMP26, at 9, 138, 175, 184, 186, 222
- 48 DSNY, *Draft SWMP26* (October 2025), p. 8, 45-46, 50, 86, 89, 179, 18485, 215, and 229.
- 49 DSNY, *Draft SWMP26* (October 2025), p. 229, 231, 232.
- 50 DSNY, *Draft SWMP26* (October 2025), p. 9, 50, 63, 87, 89, 132, 137, 138, 175, 179, 184, 186, 210, 222
- 51 DSNY, *Draft SWMP26* (October 2025), p. 9, 138, 175, 184.
- 52 Silsby, S., et al. Jan. 15, 2026, *Air emissions during destruction of PFAS materials*. *Nature Reviews Earth & Environment*. <https://www.nature.com/articles/s43017-025-00755-x>
- 53 DSNY, *Draft SWMP26* (October 2025), p. 9, 138, 175, 185.

- 54 DSNY, *Draft SWMP26* (October 2025), p. 138.
- 55 <https://www.nature.com/articles/s41598-025-90184-z>
- 56 <https://www.sciencedirect.com/science/article/pii/S0048969725005893>
- 57 <https://www.nature.com/articles/s41598-025-90184-z>
- 58 <https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks-pfas>
- 59 <https://www.sciencedirect.com/science/article/pii/S0160412020320808>
- 60 <https://pmc.ncbi.nlm.nih.gov/articles/PMC10469509/>
- 61 <https://www.sciencedirect.com/science/article/pii/S0160412025003800>
- 62 <https://pmc.ncbi.nlm.nih.gov/articles/PMC8657007/>
- 63 <https://www.nyc.gov/site/dep/whats-new/resource-recovery.page>
- 64 DSNY, *Draft SWMP26* (October 2025), p. 137-138, 184-186, Attachment D
- 65 Ali Behnami et al., *Biosolids, an important route for transporting poly- and perfluoroalkyl substances from wastewater treatment plants into the environment: A systematic review*, 925 *Sci. of the Total Env't* 171559 (2024): <https://www.sciencedirect.com/science/article/abs/pii/S0048969724017005>; Alex Scearce, et al., Linking drivers of plant per- and polyfluoroalkyl substance (PFAS) uptake to agricultural land management decisions, 18 *Biointerphases* 040801(2023): <https://pubmed.ncbi.nlm.nih.gov/37410498/>
- 66 Asta Hooge et al., *Fate of microplastics in sewage sludge and in agricultural soils*, 166 *TrAC Trends in Analytical Chemistry* 117184 (2023), <https://doi.org/10.1016/j.trac.2023.117184>
- 67 Fenton, S. E., Ducatman, A., Boobis, A., DeWitt, J. C., Lau, C., Ng, C., Smith, J. S., & Roberts, S. M. (2020). *Per- and polyfluoroalkyl substance toxicity and human health review: Current state of knowledge and strategies for informing future research*. *Environmental Toxicology and Chemistry*, 40(3), 606–630. <https://doi.org/10.1002/etc.4890>
- 68 Wallace, J. (2025, September 5). EPA's new agenda includes actions on PFAS, incinerators and more. *Waste Dive*, <https://www.wastedive.com/news/when-epa-acts-on-pfas-dischargerules-incineration-agenda/759379/>
- 69 Gwynn Johnson, PFAS in soil and groundwater following historical land application of biosolids, 211 *Water Res.*, 118035 (2022), <https://pubmed.ncbi.nlm.nih.gov/35032876/>
- 70 DSNY, *Draft SWMP26* (October 2025), p. 9, 45, 50, 132, 137, 179, 184, 186, 210
- 71 DSNY, *Draft SWMP26* (October 2025), p. 229; 6 CRR-NY 361-3.9.
- 72 EPA, EPA-822R22007, *Biosolids Biennial Report No.9* (2022): <https://www.epa.gov/system/files/documents/2022-12/2020-2021-biennial-report.pdf> ; U.S. Env't Prot. Agency (EPA), EPA-822-R-08-018, *Targeted National Sewage Sludge Survey Sampling and Analysis Technical Report* (2009): <https://19january2021snapshot.epa.gov/sites/static/files/2018-11/documents/tncsss-sampling-analysis-tech-report.pdf>
- 73 Jialin Dong et al., *Machine learning for monitoring per- and polyfluoroalkyl substance (PFAS) in California's wastewater treatment plants: An assessment of occurrence and fate*, 492 *J. of Hazardous Materials* 138030 (2025): <https://doi.org/10.1016/j.jhazmat.2025.138090>
- 74 Garret W Link et al., *Per- and polyfluoroalkyl substances (PFAS) in final treated solids (biosolids) from 190 Michigan wastewater treatment plants*, 453 *J. of Hazardous Materials* 132734 (2024): <https://doi.org/10.1016/j.jhazmat.2023.132734>
- 75 Jochen Heidler & Rolf U. Halden, *Meta-Analysis of Mass Balances Examining Chemical Fate during Wastewater Treatment*, 42 *Env't Sci. & Tech.* 6324 (2008): <https://pubs.acs.org/doi/10.1021/es703008y> .
- 76 The Leachate Loophole, <https://leachateloophole.org/> (last visited Jan. 8, 2026)
- 77 DSNY, *Draft SWMP26* (October 2025), p. 137-138.
- 78 A recent U.S. EPA report on sewage sludge determined that “a total of 739 chemicals have been identified in biosolids to date; of which about 250 of these are dioxins, furans, and PCBs.” Others include plastics (such as polyethylene terephthalate), pesticides (such as DDT), pharmaceuticals (such as fentanyl), and industrial chemicals (such as trichlorobenzene). United States Environmental Protection Agency, Office of Science and Technology, Office of Water, *Biosolids Biennial Report No.9* (Reporting Period 2020–2021), December 2022.
- 79 Suzanne E. Fenton et al., *Per- and Polyfluoroalkyl Substance Toxicity and Human Health Review: Current State of Knowledge and Strategies for Informing Future Research*, 40 *Env'tl. Toxicology and Chemistry* 606 (2020), <https://pubmed.ncbi.nlm.nih.gov/33017053/>
- 80 Garret W Link et al., *Per- and polyfluoroalkyl substances (PFAS) in final treated solids (biosolids) from 190 Michigan wastewater treatment plants*, 453 *J. of Hazardous Materials* 132734 (2024); Jochen Heidler & Rolf U.

- Halden, *Meta-Analysis of Mass Balances Examining Chemical Fate during Wastewater Treatment*, 42 Env. Sci. & Tech. 6324 (2008).
- 81 DSNY, *Draft SWMP26* (October 2025), Attachment D.
- 82 Emily Kenny, *Two more towns take action against the spreading of biosolids*, Spectrum News 1 (Dec. 3, 2025): <https://spectrumlocalnews.com/nys/central-ny/news/2025/12/03/two-more-new-york-towns-take-action-against-the-spreading-of-biosolids->; Dave Lucas, *Albany County biosolids moratorium continues as state fails to pass a similar measure*, WAMC Northeast Public Radio (June 20, 2025): <https://www.wamc.org/news/2025-06-20/albany-county-biosolids-moratorium-continues-as-state-fails-to-pass-a-similar-measure>; Natalie Abruzzo, Thurston, Cameron now only towns in New York state that ban the use of 'sewage sludge' as fertilizer, WSKG (June 19, 2025): <https://www.wskg.org/regional-news/2025-06-19/thurston-cameron-now-only-towns-in-new-york-state-that-ban-the-use-of-sewage-sludge-as-fertilizer>
- 83 NYDEC, DMM-7/ Biosolids Recycling in New York State – Interim Strategy for the Control of PFAS Compounds, https://extapps.dec.ny.gov/docs/materials_minerals_pdf/dmm7.pdf (Sept. 7, 2023); NYDEC, DMM- Draft 7A / Biosolids Recycling in New York State – Interim Strategy to Address PFAS in Biosolids Products, https://dec.ny.gov/sites/default/files/2025-12/draftdmm7a_1.pdf (2025).
- 84 New York Bill No. A6192/S5759C (2025)
- 85 Emily Kenny, New York Farm Bureau calls for state to test sewage sludge for PFAS, Spectrum News 1 (Dec. 5, 2025), <https://spectrumlocalnews.com/nys/watertown/news/2025/12/05/n-y--farm-bureau-adds-contaminated-sewage-sludge-to-2026-policy-priorities>
- 86 Jake T. Thompson et al., *Underestimation of Per- and Polyfluoroalkyl Substances in Biosolids: Precursor Transformation During Conventional Treatment*, 57 Env't Sci. & Tech. 3825 (2023): <https://pubs.acs.org/doi/10.1021/acs.est.2c06189> .
- 87 DEC, Biosolids Management in New York State, (2018): https://extapps.dec.ny.gov/docs/materials_minerals_pdf/bsmgmt2015.pdf ; DEP, *Wastewater Treatment System*: <https://www.nyc.gov/site/dep/water/wastewater-treatment-system.page> (last visited Jan. 9, 2026). <https://www.mill.com/news/nyc> (partnered with local organizations including Big Reuse, Earth Matter NY and LES Ecology Center)
- 88 <https://www.mill.com/news/city-of-phoenix-and-mill>
- 89 <https://www.kcmo.gov/Home/Components/News/News/2541/1746>
- 90 <https://www.mill.com/lp/workplace>
- 91 https://www.nyc.gov/assets/operations/downloads/pdf/mmr2025/2025_mmr.pdf
- 92 <https://centerforzerowastedsdesign.org/wp-content/uploads/2024/10/Containerization-Report-v1.pdf>
- 93 <https://centerforzerowastedsdesign.org/wp-content/uploads/2024/10/Containerization-Report-v1.pdf>
- 94 https://drive.google.com/file/d/1tB8dA_y8gIK6XySxIs50suc-QT2EdHWK/view
- 95 Farrell, K., Hirst, M., & Lange, R. (1999). New York City Department of Sanitation, *Mixed Waste Processing in New York City, A Pilot Test Evaluation*, The New York City Department of Sanitation Bureau of Waste Prevention, Reuse and Recycling, <https://www.nyc.gov/assets/dsny/downloads/resources/reports/waste-characterization-studies/mwp-1999.pdf>
- 96 Container Recycling Institute, *Bottle Bills in the USA: New York*, <https://www.bottlebill.org/index.php/current-and-proposed-laws/usa/new-york>
- 97 New York State Department of Environmental Conservation, "New York's Bottle Bill," <http://www.dec.ny.gov/chemical/8500.html>, accessed 9/19/24
- 98 Eunomia, "New York State Case Study – Expanded Bottle Bill Impact on Municipal Collections," April 2025.
- 99 Container Recycling Institute, "Redemption Rates of and Other Features of 10 U.S. State Deposit Programs," 2021.
- 100 Eunomia, "Reimagining the Bottle Bill New York Chapter Update," April 2025.
- 101 Container Recycling Institute, "Cost of Curbside Recycling for Beverage Containers," May, 2018 <http://www.container-recycling.org/index.php/publications>
- 102 Siena Research Institute, April 23, 2025, https://sri.siena.edu/wp-content/uploads/2025/06/ICS0325-Environment-Crosstabs_UpdatedMethodology.pdf
- 103 https://sri.siena.edu/wp-content/uploads/2025/06/ICS0325-Environment-Crosstabs_UpdatedMethodology.pdf
- 104 City of New York Department of Sanitation Contact with SIMS Municipal Recycling of New York LLC for Acceptance, Processing and Marketing of Recycling, PIN #82703BR00071, dated September 17th, 2008. We

do not know if there is a more recent contract, but it is our understanding that the relevant section on the “Bottle Bill” is still in place.

- 105 *Siena College Poll*, Siena College Research Institute, May 13-15, 2024
- 106 DSNY, *Draft SWMP26* (October 2025), p. 147
- 107 *Independent Recyclers in New York City: Sector Profile and Pathways to Inclusion*, 2023, <https://www.surewecan.org/study2023>
- 108 Berardi, Francesca, “Inside The World Of NYC 'Canners' Who Survive By Collecting Recyclable Cans & Bottles,” *Gothamist*, <https://gothamist.com/news/inside-the-world-of-nyc-canners-who-survive-by%20https://gothamist.com/news/inside-the-world-of-nyc-canners-who-survive-by-collecting-recyclable-cans-bottles>
- 109 Eunomia, “Employment and Economic Impact of Container Deposits – New York,” <https://eunomia.eco/reports/employment-economic-container-deposits-ny/>
- 110 Beyond Plastics, Projected Economic Benefits of the New York Packaging Reduction and Recycling Infrastructure Act (2025): https://static1.squarespace.com/static/5eda91260bbb7e7a4bf528d8/t/67ffafa1748aa5064ead370b/1744809894742/PRRIA+Economic+Benefits+Report+04.16.25_FINAL.pdf
- 111 Peter Blair, Just Zero, 10 Principles of a Successful Producer Responsibility for Packaging Law, Dec. 1, 2022, <https://just-zero.org/our-stories/from-my-experience/10-principles-of-a-successful-producer-responsibility-forpackaging-law/>
- 112 DSNY, *Draft SWMP26* (October 2025), Appendix H: Projections and Waste Characterization.
- 113 DCAS, Clean Fleet Transition Plan, 2022, <https://www.nyc.gov/assets/dcas/downloads/pdf/fleet/clean-fleet-transition-plan-october-2022.pdf>
- 114 NJDEP, Environmental Justice Mapping, Assessment, and Protection Tool, <https://experience.arcgis.com/experience/548632a2351b41b8a0443cfc3a9f4ef6>
- 115 https://energyjustice.net/files/incineration/incineration_vs_landfills.pdf
- 116 66% of which goes to Reworld Essex: https://lookerstudio.google.com/u/0/reporting/9fb578db-66f3-49e0-a0e6-c79a1f27ed7b/page/p_kz4pu15ptd
- 117 EPA, Brownfields Area-Wide Planning Pilot Project Fact Sheet: https://19january2017snapshot.epa.gov/sites/production/files/2015-09/documents/awp_newark_nj.pdf#:~:text=contains%20more%20than%20100%20brownfields%2C%20many%20located,local%20job%20opportunities%2C%20commercial%2C%20and%20recreational%20areas.
- 118 longest Superfund site, <https://www.americanrivers.org/media-item/passaic-river-listed-as-one-of-americas-most-endangered-rivers-of-2025-due-to-toxic-pollution/#:~:text=4/16/2025%20Washington%20D.C.,regional%20director%20for%20American%20Rivers>.
- 119 Earthjustice et al, *New Jersey’s Dirty Secret*, https://earthjustice.org/wp-content/uploads/nj-incinerator-report_earthjustice-2021-02.pdf
- 120 Earthjustice, https://earthjustice.org/wp-content/uploads/nj-incinerator-report_earthjustice-2021-02.pdf
- 121 *Purple smoke returns to skies above Portland waste plant*, <https://www.pressherald.com/2023/08/04/purple-smoke-returns-friday-to-skies-above-by-portland-waste-plant/>
- 122 16,000 trucks annually, https://lookerstudio.google.com/u/0/reporting/9fb578db-66f3-49e0-a0e6-c79a1f27ed7b/page/p_lgb0m8ditd
- 123 Delaware County, PA, Zero Waste Plan, https://delcopa.gov/sites/default/files/2025-04/ZeroWastePlanUpdate_03-25.pdf
- 124 DEC, Local Solid Waste Management Plans, <https://dec.ny.gov/environmental-protection/waste-management/solid-waste-management-planning/lswmp-development/chapter-5>
- 125 NRDC, Recycling Lies: “Chemical Recycling” of Plastic is Just Greenwashing Incineration, at 6 (Feb. 2022), <https://www.nrdc.org/sites/default/files/chemical-recycling-greenwashing-incineration-ib.pdf>; Global Alliance for Incinerator Alternatives, Waste Incineration: Pollution and Health Impacts (Nov. 2019): https://www.no-burn.org/wp-content/uploads/2021/11/Pollution-Health_final-Nov-14-2019-1.pdf; Ana Isabel Baptista et al., The New School, U.S. Municipal Solid Waste Incinerators: An Industry in Decline, at 34 (May 2019): https://www.no-burn.org/wp-content/uploads/2021/03/CR_GaiaReportFinal_05.21-1.pdf; Neil Tangri & Monica Wilson, Global Alliance for Incinerator Alternatives, Waste Gasification & Pyrolysis: High Risk, Low Yield

- Processes for Waste Management, at 9 (2017): <https://www.no-burn.org/wp-content/uploads/Waste-Gasification-and-Pyrolysis-high-risk-low-yield-processes-march-2017.pdf>
- 126 Ana Isabel Baptista, et al., U.S. Municipal Solid Waste Incinerators: An Industry in Decline, p. 34 (May 2019): https://www.no-burn.org/wp-content/uploads/2021/03/CR_GaiaReportFinal_05.21-1.pdf
- 127 Jose L. Domingo, et al., *Adverse health effects for populations living near waste incinerators with special attention to hazardous waste incinerators. A review of the scientific literature*, 187 *Env. Research* (Aug. 2020), <https://doi.org/10.1016/j.envres.2020.109631>
- 128 DSNY, *Draft SWMP26* (October 2025), p. 32
- 129 Kevin Budris, Just Zero, Loopholes, Injustice, & the “Advanced Recycling” Myth, at 28-33 (Dec. 2022): <https://just-zero.org/wp-content/uploads/2022/12/2022-12-14-Just-Zero-Advanced-Recycling-Report.pdf>
- 130 Tsiamis, D. A., Torres, M., & Castaldi, M. J. (2018). Role of plastics in decoupling municipal solid waste and economic growth in the U.S. *Waste Management*, 77, 147–155. <https://doi.org/10.1016/j.wasman.2018.05.003>
- 131 Mastry, M. C., Dorazio, L., Fu, J. C., Gómez, J. P., Sedano, S., Ail, S. S., Castaldi, M. J., & Yilmaz, B. (2023). Processing renewable and waste-based feedstocks with fluid catalytic cracking: Impact on catalytic performance and considerations for improved catalyst design. *Frontiers in Chemistry*, 11. <https://doi.org/10.3389/fchem.2023.1067488>
- 132 Ventola, V., Brenman, E., Chan, G., Ahmed, T., & Castaldi, M. J. (2021). Quantitative analysis of residential plastic recycling in New York City. *Waste Management & Research: The Journal for a Sustainable Circular Economy*, 39(5), 703–712. <https://doi.org/10.1177/0734242x211009968>
- 133 Ventola, V., Brenman, E., Chan, G., Ahmed, T., & Castaldi, M. J. (2021). Quantitative analysis of residential plastic recycling in New York City. *Waste Management & Research: The Journal for a Sustainable Circular Economy*, 39(5), 703–712. <https://doi.org/10.1177/0734242x211009968>
- 134 Fortuna, L. M., & Castaldi, M. J. (2018). New York City’s Reuse Impact Calculator: Quantifying the zero waste impact of materials reuse. *Waste Management & Research*, 36(12), 1190-1200.
- 135 Fair Share? Siting New York City’s Municipal Facilities, NYC Comptroller’s Office, Nov. 9, 2023, <https://storymaps.arcgis.com/stories/0bb62803d9d44ade81f16de2cdc378e4>; DSNY, Report on the Implementation of New York City’s Waste Equity Law: Annual Report for Calendar Year 2023 (2024), <https://www.nyc.gov/assets/dsny/downloads/resources/reports/waste-equity-law/2023/waste-equity-report-cy-2023.pdf>
- 136 DSNY, *CWZ Annual Report 2025*, <https://home4.nyc.gov/assets/dsny/downloads/resources/reports/cwz-implimentation-plan/cwz-annual-report-2025.pdf>
- 137 Justin Brannan and Lincoln Restler, Op-ed | When it comes to fines, one size does not fit all, AMNY, (October 2025), <https://www.amny.com/oped/op-ed-nyc-fines-tickets/>
- 138 PlaNYC: Getting Sustainability Done, <https://www.nyc.gov/assets/climate/downloads/pdfs/PlaNYC-2023-Full-Report.pdf>
- 139 RC1: https://www.nyc.gov/html/gbee/downloads/pdf/resource_conservation.pdf
- 140 Reclaim NYC Deconstruction and Reuse Action Plan, <https://reclaim-nyc.org/action-plan/>
- 141 AIANY Building Decarbonization Action Plan, <https://www.aiany.org/wp-content/uploads/2025/11/AIANY-Building-Decarbonization-Action-Plan.pdf>
- 142 undo.org/little-big-lie
- 143 New York Department of Sanitation (DSNY), DSNY Monthly Tonnage Data, https://data.cityofnewyork.us/CityGovernment/DSNY-Monthly-Tonnage-Data/ebb7-mvp5/about_data, 2025.
- 144 Clarke, M. J., & Maantay, J. A., Optimizing recycling in all of New York City’s neighborhoods: Using GIS to develop the REAP index for improved recycling education, awareness, and participation. *Resources, Conservation and Recycling*, 46(2), 128–148, 2006. Clarke, M. J., *Optimizing Recycling in All the Neighborhoods of New York City: The Roles of Demographics, Education, Barriers, and Program Changes*. The Nineteenth International Conference on Solid Waste Technology And Management. Philadelphia, PA. Presented 21-24 March 2004.
- 145 Ng, S.-L. (2019). Predicting multifamily dwelling recycling behaviors using structural equation modelling: A case study of Hong Kong. *Resources, Conservation and Recycling*, 149, 468–478. <https://doi.org/10.1016/j.resconrec.2019.06.007>
- Taberero, C., Hernández, B., Cuadrado, E., Luque, B., & Pereira, C. R., A multilevel perspective to explain recycling behaviour in communities. *Journal of Environmental Management*, 159, 192–201, 2015.

-
- 146 Mahapatra, K., Dadvar, A., Mainali, B. (2021). Recycling Behavior in a Multicultural Urban Area in Sweden. *International Journal of Environmental and Ecological Engineering*, 15.8, 221–225. Retrieved from <https://urn.kb.se/resolve?urn=urn:nbn:se:lnu:diva-106256>
- 147 MacLaren, V., Ikiz, E. and Alfred, E., Meeting urban GHG reduction goals with waste diversion: multi-residential buildings, *Buildings and Cities*, 3(1), p. 1042–1058, 2022; Ng, S.-L. (2019). Predicting multifamily dwelling recycling behaviors using structural equation modelling: A case study of Hong Kong. *Resources, Conservation and Recycling*, 149, 468–478. <https://doi.org/10.1016/j.resconrec.2019.06.007> ; Dello, R. (2019). Promotion & education engagement to establish multi-residential best practices (Continuous Improvement Fund No. 979). https://thecif.ca/wp-content/uploads/2019/02/979-Toronto_Final_Report.pdf ; Katzev, R., Blake, G., & Messer, B. (1993). Determinants of participation in multi-family recycling programs. *Journal of Applied Psychology* 23(5), 374–385. DOI: <https://doi/10.1111/j.1559-1816.1993.tb01093.x>
- 148 <https://www.nyipi.org/wp-content/uploads/2025/10/A-Peoples-SWMP-Report.pdf>
- 149 https://lookerstudio.google.com/reporting/bea12cb7-047f-4b3a-adcf-7f98674f25fb/page/p_d55xv9stwd?s=ha6F2KXiUwM
- 150 <https://www.nyc.gov/site/dsny/collection/residents/curbside-composting.page>
- 151 <https://portal.311.nyc.gov/article/?kanumber=KA-02030>
- 152 DSNY’s 2023 Waste Characterization Study, <https://www.nyc.gov/assets/dsny/downloads/resources/reports/waste-characterization-studies/2023/wcs-2023.pdf>
- 153 Funk, Cary (2021). Key findings: How Americans' attitudes about climate change differ by generation, party and other factors. Pew Research Center.
- 154 DSNY, Clean Building Trainings, <https://www.nyc.gov/site/dsny/resources/building-management/clean-buildings-trainings.page>
- 155 <https://www.nysenate.gov/legislation/bills/2023/S2022>