

NYC - Business Integrity Commission  
September 17, 2018

1 THE NEW YORK CITY  
2 BUSINESS INTEGRITY COMMISSION

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3 PUBLIC HEARING

4 AMENDMENT OF RULES REGARDING IMPROVING THE  
5 SAFETY OF THE GENERAL PUBLIC

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10 September 17, 2018

11 10:10 a.m.

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17 Reported by:

18 Danielle Rivera  
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NYC - Business Integrity Commission  
September 17, 2018

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1 A P P E A R A N C E S:

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3 NEW YORK CITY BUSINESS INTEGRITY COMMISSION

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5 EMILY ANDERSON  
6 Executive Agency Counsel

7 SALVADOR ARRONA  
8 Director of Policy

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NYC - Business Integrity Commission  
September 17, 2018

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1 MS. ANDERSON: Good morning, and  
2 welcome to today's public hearing. The  
3 time is 10:10 on Monday,  
4 September 17, 2018. We are located in  
5 the second floor conference room  
6 of 100 Church Street. My name is Emily  
7 Anderson. I am Executive Agency Counsel  
8 at the New York City Business Integrity  
9 Commission.

10 Thank you for attending today's  
11 hearing. The Commission is conducting  
12 today's hearing pursuant to the  
13 requirements set forth by the City  
14 Administrative Procedure Act, commonly  
15 referred to as "CAPA."

16 The purpose of today's hearing is to  
17 receive comments from the public on the  
18 Commission's proposed amendments to  
19 Title 17 of the Rules of the City of New  
20 York. These amendments are designed to  
21 improve the safety of the general  
22 public.

23 The Commission published the  
24 proposed rules that are the subject of  
25 today's hearing in the City Record on

1 August 17, 2018. The Commission also  
2 disseminated a copy of the rules via  
3 e-mail to all New York City local  
4 elected officials, the managers of  
5 all 59 community boards, several media  
6 organizations in the City and other  
7 interested parties. Lastly, the  
8 Commission posted the proposed rules on  
9 both the Commission and the New York  
10 City Rules websites.

11 The amendments will require  
12 licensees to increase the limits on  
13 commercial general liability, business  
14 automobile liability and employer's  
15 liability insurance, and require  
16 registrants to increase the limit on  
17 business automobile liability insurance.

18 The amendments will also require  
19 licensees and registrants to notify BIC  
20 of their drivers' Vehicle and Traffic  
21 Law violations and driver's license  
22 suspensions or revocations, crashes that  
23 involve a vehicle used in the licensee's  
24 or registrant's business, and to notify  
25 BIC of certain adverse actions by any

1 federal, state and local government  
2 authorities, including actions that  
3 result in the suspension or revocation  
4 of a permit, license or other permission  
5 required in connection with the  
6 operation of the licensee's or  
7 applicant's business or a penalty or  
8 fine of \$1,000 or more.

9 The amendments will also require  
10 licensees and registrants to maintain  
11 written policies and procedures  
12 regarding compliance with all laws,  
13 rules, and regulations of the federal,  
14 state and local government authorities.

15 The amendments will also require  
16 licensees and registrants to maintain  
17 Report of Motor Vehicle Accident,  
18 MV-104, Forms and other forms related to  
19 crashes, as well as adverse  
20 determinations by any federal, state and  
21 local government authorities.

22 The proposed rules that are the  
23 subject of today's hearing are being  
24 promulgated under the Commission's  
25 current authority, which permits the

1 Commission to establish standards for  
2 service and regulation of conduct of  
3 businesses licensed and registered with  
4 the Commission, including, but not  
5 limited to, requirements governing the  
6 maintenance and inspection of records,  
7 the maintenance of appropriate insurance  
8 and compliance with safety and health  
9 measures.

10 Today's amendments are the first  
11 step to improving safety in the trade  
12 waste industry. Our next steps include  
13 pursuing legislation to empower BIC to  
14 do more in the safety area and adopting  
15 a zone collection system for the trade  
16 waste industry.

17 The Commission will now receive oral  
18 and written comments from members of the  
19 public attending today's hearing. The  
20 Commission has been accepting written  
21 comments on the proposed rule since the  
22 publication in the City Record and will  
23 continue to do so through the close of  
24 business today.

25 The Commission will also make

1           available a copy of any written comments  
2           that are received in connection with  
3           today's hearing. The Commission will  
4           carefully review and consider all  
5           comments and submissions and make  
6           changes, if the Commission deems them  
7           necessary. The rules will go into  
8           effect after they are published in the  
9           City Record.

10           We will now begin calling those of  
11           you who wish to speak this morning in  
12           the order in which you have signed in.  
13           When you speak, please state your full  
14           name and affiliation. Also, please  
15           spell your name and affiliation. Speak  
16           slowly and clearly so that the court  
17           reporter can understand and accurately  
18           transcribe your statement. We ask that  
19           you limit your statement to five  
20           minutes.

21           The Commission's Director of Policy,  
22           Salvador Arrona, will now begin calling  
23           up members of the public to testify.

24           MR. ARRONA: Good morning. The  
25           first speaker is Steve Changaris.

1 MR. CHANGARIS: This might be  
2 helpful (handing).

3 Good morning. My name is Steve  
4 Changaris. I'm the Chapter Director for  
5 the New York City Chapter of the  
6 National Waste and Recycling  
7 Association. I've submitted formal  
8 written comments to the stenographer.  
9 I'm going to try to be conversational  
10 instead of reading this verbatim.

11 The written testimony is submitted  
12 in the response to the BIC proposed rule  
13 to amend Title 17 of the Rules of the  
14 City of New York to improve the safety  
15 of the general public, and as noted  
16 earlier, it's been posted on the web and  
17 to the regulated companies.

18 The New York City Chapter supports  
19 the introduction of the proposed  
20 regulation, and the direction it signals  
21 that BIC will be going, in the  
22 furtherance of its oversight role for  
23 the City's private carting industry. We  
24 will make some general comments, some  
25 specific questions, and then finish with



1 a final recommendation.

2 In essence, this is a recordkeeping  
3 and notice rule for BIC permittees. In  
4 our analysis, the key to understanding  
5 or thinking about it in the context of  
6 safety turns on what BIC will do with  
7 this new information that will be  
8 provided by the private carting  
9 industry.

10 Since the regulation is largely  
11 silent on this, we, as the regulated  
12 community, have justifiable concerns  
13 about its final adoption as currently  
14 drafted. And other than fines for not  
15 reporting certain occurrences within a  
16 given timeframe, the regulation really  
17 doesn't give us a lot of -- a glimpse  
18 into how this information is going to be  
19 used.

20 So, the second point we want to  
21 mention is that we know the trade waste  
22 commission regulates the maximum rates  
23 that can be charged by licensees. Last  
24 month, the recently adopted rate cap  
25 increase went into effect. During that

1 rate-making process, we talked about the  
2 cost of the administrative regulation on  
3 the industry. We also noted the impacts  
4 of the China nationalist war and the  
5 other problems going on in the world of  
6 recycling.

7 We used that opportunity then, as we  
8 will now, to combine the cost impacts of  
9 these new administrative regulations,  
10 along with the pre-existing cost about  
11 the collapse of the recycling markets,  
12 so that the BIC conducts further rate  
13 analysis to grant economic hardship  
14 relief to the industry via another  
15 increase in the rate cap.

16 If I might, the specific questions  
17 that we have on the regulation. First,  
18 we ask, why is the BIC proposing one of  
19 the coverages in a half-million dollar  
20 increment? We don't know where that  
21 came from. Why is the BIC proposing an  
22 A-10 rating standard for insurance  
23 companies to be eligible to underwrite  
24 BIC insurance policies for BIC  
25 companies? What are the reasons and

1           rationale that the new proposed BIC  
2           limits are going to be increased for CGL  
3           to \$5 million, business automobile  
4           liability to \$2 million, and employer's  
5           liability at \$1.5 million?

6           Another question is, what is the  
7           reasoning for the one-size-fits-all  
8           maximum not to exceed a deductible of  
9           \$50,000 for CGL coverage? Another  
10          question, how will the BIC reconcile the  
11          differences between these new  
12          regulations and a regulated company's  
13          existing coverage in a self-insurance or  
14          a captive program or one with a higher  
15          preset deductible limit?

16          Another question, -- I've got three  
17          or four more -- how did BIC come to the  
18          proposed definition of "crash" in these  
19          proposed regulations? Can the  
20          Commission, by policy or directive,  
21          after this regulation is adopted, alter  
22          or refine the scope of what  
23          crash-related information regulated  
24          companies will be required to provide?

25          And can the Commission amend this

1           proposal and add an equivalency waiver  
2           or a work-around performance standard  
3           provision to accommodate conflicts that  
4           are sure to arise between sound,  
5           existing industry practices in this area  
6           and the new practices required by the  
7           existing proposed regulation?

8           So, finally, the recommendation  
9           we're going to make, as noted initially,  
10          the Chapter is supportive of this  
11          proposed regulation and the expanded BIC  
12          role in safety oversight of the industry  
13          and the trendline of where it's going.  
14          And we've raised, in this testimony,  
15          many legitimate questions with unknown  
16          answers.

17          So, accordingly, we respectfully  
18          request that the BIC put a hold on the  
19          further movement of this regulation and  
20          make use of a 60- or 90-day period and  
21          get further input from all stakeholders,  
22          including the regulated companies,  
23          insurance experts, safety experts and  
24          other appropriate interested parties.  
25          Through that process, we really believe

1           that the regulation proposal can be  
2           better for the BIC, can be better for  
3           the safety of the citizens of New York  
4           and can be more workable to the  
5           companies regulated by the BIC, having  
6           to comply with the regulation.

7           So, we pledge to work with the BIC  
8           towards that end, and we are grateful  
9           for the opportunity to participate in  
10          BIC activities and present these  
11          remarks. Thank you very much.

12          MR. ARRONA: Thank you, Steve. The  
13          next speaker is Daniel Wright from Local  
14          813.

15          MR. WRIGHT: Good morning. I'm  
16          Daniel Wright, W-R-I-G-H-T, Teamsters  
17          Local 813. Thank you for the  
18          opportunity to testify today.

19          As the Union that represents private  
20          sanitation workers in New York City,  
21          Teamsters Local 813 sees this industry's  
22          safety crisis on a daily basis. Last  
23          month, the Business Integrity Commission  
24          took appropriate action by suspending  
25          the license of Sanitation Salvage to

1 protect New Yorkers from the company's  
2 dangerous and reckless practices.

3 Unfortunately, the problems go far  
4 beyond Sanitation Salvage. In most of  
5 the industry's companies, big and small,  
6 workers are pushed to the limit with  
7 six-day work weeks and shifts longer  
8 than 12 hours. The few companies with  
9 safe schedules are the exception that  
10 proves the rule.

11 The private sanitation industry is  
12 responsible for an inordinate number of  
13 fatal crashes. Mouctar Diallo, Leon  
14 Clarke, Neftaly Ramirez; these are just  
15 a few of the New Yorkers who have lost  
16 their lives beneath the wheels of  
17 private sanitation trucks in recent  
18 years.

19 We believe all these deaths were  
20 preventable. The industry needs to  
21 begin to take safety seriously. It's  
22 not about photo ops and press releases.  
23 It's about following the law for truck  
24 maintenance, not overworking drivers and  
25 putting lives ahead of profits. It's

1           about taking responsibility for crashes  
2           rather than sweeping them under the rug,  
3           as too often happens among private  
4           carters.

5           This is a lawless industry. There  
6           are still companies that don't provide  
7           legally-required boots, gloves, vests  
8           and other safety equipment. There are  
9           still companies that are covering up  
10          injuries. There are still companies  
11          that assign routes that cannot be  
12          completed on time without breaking  
13          traffic laws.

14          Not every company is shirking  
15          safety. There are some good companies  
16          that have regular safety training and  
17          maintain their trucks. But it's hard  
18          for them to compete with the cheap  
19          carters who are cutting every corner.

20          That is why Mayor de Blasio's  
21          commercial waste zone policy is so  
22          important. Until that policy is fully  
23          in place, we won't be addressing the  
24          fundamental problems plaguing the  
25          industry. We will finally have

1 reasonable routes. We will finally have  
2 safety standards with real teeth. And  
3 we will finally have accountability, so  
4 carters have to follow the rules or risk  
5 losing their contract.

6 Thank you for the opportunity to  
7 testify to the Commission today, and  
8 thank you for working with us to improve  
9 safety in the private sanitation  
10 industry.

11 MR. ARRONA: Thank you, Daniel. The  
12 next speaker is Thomas Toscano from  
13 Mr. T Carting.

14 MR. TOSCANO: (Handing.) Good  
15 morning. My name is Thomas Toscano, and  
16 I'm the CEO of Mr. T Carting  
17 Corporation.

18 I want to start by saying that I  
19 fully recognize safety is an issue in  
20 this industry, and I commend the City  
21 and the Business Integrity Commission  
22 for trying to address it. Know that I  
23 am in full support of increasing safety  
24 for all, and that requires increased  
25 standards that will be in the form of



1 regulations.

2 As a start, I would like to briefly  
3 list all of the reporting requirements  
4 currently on the carters who serve the  
5 City of New York. First, there is a  
6 customer registry that requires 96  
7 pieces of data on each and every  
8 customer I have. This is prepared  
9 quarterly. Annually, there is a very  
10 detailed financial statement due to the  
11 BIC.

12 Recently, carters have been asked to  
13 provide detailed information regarding  
14 their vehicles on a real-time basis for  
15 compliance with Local Law 145. We are  
16 required to continually update the BIC  
17 on all new employees and principals of  
18 our companies. My company actually does  
19 this weekly.

20 There are nine specific journals and  
21 ledgers that are required to be  
22 maintained by the BIC rules that were  
23 designed at a time when most businesses  
24 did not use computers. These rules are  
25 antiquated and require double

1           bookkeeping to be fully compliant  
2           because most computer software programs  
3           are not designed this way.

4           Recently, there have been very  
5           detailed requests for route data for the  
6           franchising study, and this has been  
7           required because the data gathered in  
8           2014 was done so hastily and  
9           retroactively to rush out a report  
10          endorsing franchising. This is not a  
11          comprehensive list, but the major  
12          highlights have been hit.

13          I start here so we understand the  
14          baseline of where we are when this  
15          legislation is proposed to increase  
16          reporting requirements. Again, and to  
17          be clear, I support where this effort is  
18          going and its goal, and I understand the  
19          need for data to get there. I also  
20          support the new insurance requirements  
21          with a few small proposed changes that  
22          have been brought up by my very able  
23          colleagues. However, the data requests,  
24          the requests, will give you a lot of  
25          noise and thereby decrease your ability

1 to proactively spot safety issues before  
2 accidents happen.

3 I start with the definition of the  
4 word "crash" in the proposed  
5 regulations. In a highly-populated area  
6 with millions of parked cars and over  
7 100,000 customers picked up nightly,  
8 small property damage incidents are  
9 bound to happen. Cars suffer minor  
10 damage and the carters pay to resolve  
11 these issues, many times without going  
12 through insurance.

13 Under your proposed regulations,  
14 every one of these incidents will need  
15 to be reported. For that reason, I  
16 propose amending the definition of the  
17 word "crash" to only include property  
18 damage over \$5,000 or where an injury  
19 occurs. This will eliminate reporting  
20 of minor accidents on the carters and  
21 noise, again, in the data.

22 I make the same general comment with  
23 regard to violations, starting with the  
24 fact that there seems to be some  
25 contraindication in the revised

1 regulations, notably Sections 1-12(b)  
2 and 2-05(a)(2). I agree with the \$1,000  
3 threshold on violations that is absent  
4 in the latter.

5 Another Section, 1-12(c) deals with  
6 Vehicle and Traffic Law Violations, and  
7 there, there's no threshold. The  
8 violations reporting has two problems.  
9 First, it's unnecessary. The BIC  
10 already requires me to provide all of my  
11 drivers' information, and the DMV  
12 provides, in real-time, reporting on  
13 violations and license action. If my  
14 company can access that information, I  
15 am sure the BIC, as a government agency,  
16 can as well.

17 Second, other types of violations,  
18 like most of those in front of the  
19 Environmental Control Board, should only  
20 be required where the amount of the fine  
21 exceeds \$1,000. As an attorney, I have  
22 fought these violations and have been  
23 very successful in having them  
24 dismissed. However, many companies just  
25 pay them as a cost of doing business to

1           avoid spending hours at the ECB or  
2           hiring an attorney.

3           My last comment to the proposed  
4           regulations is on the part I will call  
5           the 'Code of Conduct' provisions. There  
6           are several in there that require  
7           carters to have written policies  
8           regarding compliance with the law.  
9           These are extremely general provisions,  
10          and I support their intention.

11          However, vague regulations where  
12          lack of compliance will only come to  
13          light after an accident to assess fines  
14          does not get us where we need to be. If  
15          you want a code of conduct that all  
16          carters are required to follow, lets  
17          work together and draft specific actions  
18          that carters are required to take or to  
19          avoid that are conditions of our  
20          licenses.

21          In conclusion, I again repeat that I  
22          support this effort wholeheartedly, and  
23          I want this industry to be better in all  
24          aspects, especially safety. As  
25          Commissioner Brownell has said, "When

1           one of these accidents happen, we might  
2           as well all be behind the wheel of that  
3           vehicle," and I agree with that point  
4           completely.

5           Punishing companies that are good  
6           actors with onerous and unnecessary  
7           reporting requirements and vague policy  
8           requirements will not make us better.  
9           In fact, if this is viewed by carters as  
10          a simple revenue generation by the City,  
11          it will be made worse because its  
12          seriousness will be diluted.

13          Targeted reporting that is designed  
14          to flag bad actors before they cause  
15          accidents and specific policy  
16          requirements are what will accomplish  
17          this. I welcome the opportunity of  
18          working with the BIC to that end. Thank  
19          you.

20          MR. ARRONA: Thank you, Tom. The  
21          next speaker is Melissa Iachan.

22          MS. IACHAN: Good morning. My name  
23          is Melissa Iachan. I'm the Senior Staff  
24          Attorney in the Environmental Justice  
25          Program at New York Lawyers for the

1 Public Interest.

2 NYLPI is a member of 'Transform  
3 Don't Trash New York City,' a coalition  
4 of labor, community and environmental  
5 groups advocating for fundamental reform  
6 of the broken commercial waste system.

7 NYLPI strongly supports the adoption  
8 of the proposed rules as a modest, but  
9 important, step towards holding private  
10 hauling companies accountable for their  
11 poor safety practices, the deteriorating  
12 conditions of their truck fleets and  
13 unreasonably long hours and routes  
14 required of drivers and helpers in this  
15 dangerous industry.

16 Given the troubling increase in the  
17 amount of serious and fatal crashes  
18 involving commercial haulers in recent  
19 years, we are particularly encouraged  
20 that these rules will require waste  
21 companies to report all crashes,  
22 driver's license suspensions and traffic  
23 law violations to BIC, which can then  
24 take these safety indicators into  
25 consideration when making a

1 determination of whether a company has  
2 the requisite good character, honesty  
3 and integrity to operate in our City.

4 We add that we would like to see  
5 additional employee-specific  
6 requirements added to the recordkeeping  
7 and/or reporting obligations imposed on  
8 haulers under Title 17 of the Rules of  
9 the City of New York, including, but not  
10 limited to, the maintenance and  
11 provision of employee time sheets.

12 The promulgation and adoption of  
13 these rules alone will not be enough to  
14 alter the dangerous inefficiency and  
15 race-to-the-bottom atmosphere in the  
16 private carting system. If there is no  
17 way to enforce or hold haulers  
18 accountable for failing to comply with  
19 them, there is no point in publishing  
20 these rules at all.

21 Currently, despite many existing  
22 rules requiring a litany of obligations  
23 on haulers in order for them to receive  
24 licenses and operate in the City,  
25 including the requirement to disclose



1 all employees to BIC within ten days of  
2 hire, we see little enforcement of these  
3 rules, and few violations being issued  
4 for failing to adhere to them.

5 Further, there is ample evidence  
6 that the already existing recordkeeping  
7 and reporting requirements for trade  
8 waste haulers are actually violated  
9 routinely, despite not seeing haulers  
10 issued serious violations or denials for  
11 such behavior.

12 For example, the 2016 Private  
13 Carting study performed for DSNY and BIC  
14 by Buro Happold Engineering found that  
15 trade waste licensees reported an  
16 unrealistically small number of helpers.  
17 This is evidence of widespread  
18 off-the-books employment of casual, or  
19 day laborers, as helpers, which  
20 undermines safety practices and makes  
21 these workers particularly vulnerable to  
22 wage theft, exploitation and being  
23 unprepared to handle unsafe situations,  
24 which can lead to tragedy, as we saw  
25 with Mouctar Diallo.

1           BIC's investigation of Sanitation  
2           Salvage also revealed regular systemic  
3           failures by the company to disclose  
4           employees. And yet, this modus operandi  
5           went on for years without repercussion.  
6           We believe non-disclosure of employees  
7           is widespread in the waste industry and  
8           that enforcement of existing and  
9           potential new rules, such as requiring  
10          regular submission of employee time  
11          sheets and payroll, is a necessary  
12          measure.

13          However, we want to stress that even  
14          with the adoption and enforcement of  
15          more robust safety rules, the commercial  
16          waste industry remains in dire need of  
17          more significant improvements. Only the  
18          fundamental reform and increased  
19          enforcement leverage enabled by the  
20          upcoming transition to a zoned  
21          commercial waste system will ensure that  
22          waste companies adopt safer, more  
23          efficient and more environmentally-sound  
24          operating practices.

25          Under the zone system, the City will

1 execute long-term contracts with the  
2 hauler or haulers selected to serve each  
3 commercial district, giving BIC and DSNY  
4 much greater leverage to negotiate and  
5 enforce safety, environmental and equity  
6 standards.

7 In conclusion, we at NYLPI voice our  
8 full-throated support of the proposed  
9 rules, but encourage BIC to do much more  
10 to raise the standards of operation in  
11 this dirty and dangerous industry.

12 We look forward to continuing to  
13 work together with BIC, DSNY, the  
14 Mayor's Office and City Council to  
15 ensure that the upcoming zoning plan  
16 truly implements the holistic and  
17 transformative reforms that we believe  
18 are necessary to actually make this  
19 industry safe for all its workers and  
20 everyone on our streets. Thank you.

21 MR. ARRONA: Thank you, Melissa.  
22 The next speaker is Counsel Member  
23 Reynoso.

24 MR. REYNOSO: Thank you and good  
25 morning to all. My name is Antonio

1 Reynoso. I'm the Council Member from  
2 the 34th District representing  
3 Williamsburg and Bushwick in Brooklyn  
4 and Ridgewood in Queens. I also chair  
5 the City Counsel's Committee on  
6 Sanitation and Solid Waste Management,  
7 which has oversight over the Business  
8 Integrity Commission. I am pleased to  
9 have the opportunity to testify today on  
10 important rules being proposed.

11 For many years I, along with  
12 countless workers and advocates, have  
13 been sounding the alarm about the deeply  
14 dangerous and reckless practices present  
15 in the private carting industry.

16 Ultimately, the threats to pedestrian  
17 and worker safety come from the often  
18 unsafe manner in which companies handle  
19 the 40-ton trucks that carry out the  
20 work of collecting commercial waste of  
21 off our streets on a nightly basis.

22 The operation of such large  
23 machinery requires the utmost attention  
24 to safety, which for far too long has  
25 taken a backseat to trying to move

1 through routes as quickly as possible.  
2 The proposed rules are an incremental  
3 step toward improving safety among  
4 private carters by collecting  
5 information on drivers' histories,  
6 Vehicle and Traffic Law violations, as  
7 well as vehicle driver's license  
8 suspensions and revocations. The agency  
9 will be better equipped to identify  
10 those drivers with a pattern of unsafe  
11 behavior.

12 Furthermore, by requiring companies  
13 to report on any adverse action taken  
14 against them by federal, state and local  
15 authorities, we can ensure the unsafe  
16 behavior does not simply get masked  
17 through a lack of inter-agency  
18 communication. I'm glad that BIC is  
19 taking steps, but I continue to have my  
20 concerns. These rules are only  
21 meaningful if they are aggressively  
22 enforced.

23 Time and time again, we find that  
24 companies have simply disregarded BIC's  
25 existing reporting requirements without

1           suffering even minor consequences. This  
2           was highlighted most recently in the  
3           hearing regarding the suspension of  
4           Sanitation Salvage's license, where we  
5           found out that the company had failed to  
6           register its employees with BIC on  
7           numerous occasions. This is highly  
8           disturbing when we consider that  
9           employee registration is a critical  
10          component of BIC's core mission,  
11          ensuring that members of organized crime  
12          are not active in the industry.

13           I'm supportive of BIC enacting these  
14          new rules, but I strongly urge them to  
15          aggressively enforce them once enacted.  
16          Otherwise, they will simply stand as a  
17          hollow gesture with no impact on  
18          industry practices.

19           Finally, I want to stress that this  
20          industry continues to be plagued by a  
21          range of problematic behaviors and  
22          practices that will require nothing  
23          short of a complete overhaul of the  
24          entire private waste industry. A  
25          management system, through which, I

1 believe, commercial waste zoning would  
2 be the solution. While we work to  
3 ensure the enactment of a responsible  
4 and effective zoning system, these rules  
5 can serve as a stop-gap measure ensuring  
6 that we are doing everything we can to  
7 respond immediately to the dangers posed  
8 by our current system.

9 I look forward to working with BIC  
10 to continue exploring ways we can take  
11 steps now to protect the safety of  
12 pedestrians and workers alike, while  
13 moving towards comprehensive reform.  
14 Thank you for allowing me to testify  
15 today.

16 MR. ARRONA: Thank you, Counsel  
17 Member Reynoso. The next speaker is  
18 Counsel Member Cornegy.

19 MR. CORNEGY: Thank you, and good  
20 morning. I believe that the height of  
21 this microphone is probably  
22 discriminatory. I am Counsel Member  
23 Cornegy. I represent the 36th Council  
24 District in Bedford Stuyvesant and  
25 Northern Crown Heights. I currently

1 chair the Committee on Housing and  
2 Buildings, and previously chaired the  
3 Committee on Small Business Services.

4 So, the watchdog of the private  
5 sector of the commercial waste industry,  
6 the Business Integrity Commission, has  
7 on more than one occasion come before  
8 the New York City Council to say that  
9 they need more authority to regulate the  
10 industry that they were tasked to  
11 oversee. We were all tremendously  
12 saddened by the senseless preventable  
13 injuries and deaths of New Yorkers by  
14 both private sanitation and DSNY  
15 vehicles.

16 The level of incidents in the  
17 private and City-run sanitation sectors  
18 is unacceptable. I believe that we can  
19 no longer wait for the administration's  
20 mythical remedy to franchise the  
21 commercial system about six years from  
22 now. Franchising is not a real solution  
23 to prevent accidents, to put bad actors  
24 out of service, to lessen congestion,  
25 nor to protect our environment.



1           Today, as we view updated  
2           regulations that aim to encourage  
3           transparency and update safety standards  
4           in this industry, I want to holler at a  
5           piece of legislation that I've  
6           introduced, Intro 996, which, when  
7           passed, will immediately give BIC the  
8           tools to better regulate and improve  
9           standards across the board. 996 will  
10          immediately give BIC a better audit and  
11          reporting authority over the private  
12          waste industry.

13          By increasing BIC's regulatory and  
14          reporting authority, Intro 996 will  
15          protect the safety and jobs of the  
16          workers in the commercial waste  
17          collection industry, especially  
18          second-chance workers; protect the over  
19          200,000 businesses in the City who pay  
20          for their waste removal, especially  
21          small-business owners such as  
22          supermarkets, storefront mom-and-pops  
23          and restaurants from losing control of  
24          the cost and quality of their services;  
25          and protect the environment and quality

1 of our neighborhoods now from bad-acting  
2 companies.

3 If any private sanitation fails to  
4 meet these new standards, BIC will have  
5 the authority to shut that company down  
6 and deny them their license to operate.  
7 BIC will also have the authority to  
8 create new rules to improve safety and  
9 to report any action on our streets that  
10 may put workers and the public in harm's  
11 way.

12 Intro 996 is a partnership with  
13 those who work in and are served by the  
14 industry, including the Mason Tenders  
15 District Council Local 108, who  
16 represents the majority of unionized  
17 employees in private waste, the New York  
18 State NAACP, the National Supermarket  
19 Association, the Bodega Association, and  
20 Chambers of Commerce throughout the  
21 City.

22 When I introduced 996, I had an  
23 employee of the industry stand with me  
24 named Dwayne. At the rally, he talked  
25 about how difficult it was for him after

1 his incarceration to find a job, even  
2 with the experience he had. He had been  
3 working now in the industry steadily for  
4 over six years. And like his  
5 colleagues, who are predominantly  
6 Hispanic and African American, he relies  
7 on the industry for his livelihood. He  
8 is one of the thousands of people who  
9 are employed in this industry whose jobs  
10 would be on the line and at risk if  
11 franchising is implemented.

12 I introduced this bill with these  
13 people in mind. With middle-class jobs  
14 being far and few between, and as our  
15 City is becoming more and more  
16 unaffordable, government needs to make  
17 absolutely sure that we work to protect  
18 these employees and improve conditions,  
19 not jeopardize New Yorker's jobs.

20 The City Administration, in its  
21 proposal to franchise the commercial  
22 waste industry, has made bold,  
23 unsupportable claims that if we wait to  
24 study the issue for six-plus years, that  
25 all the issues in the sanitation

1 industry will resolve if we implement  
2 this system of waste collection.

3 But the City is doing this without  
4 any real explanation or examination of  
5 any quicker alternative options of how  
6 franchising would solve any of these  
7 problems. And, I believe the City is  
8 potentially wasting \$8 million on an  
9 out-of-town consultant to tell us what  
10 we already know from watching these same  
11 deliberations on zones in three major  
12 cities; Chicago, Boston and Los Angeles.

13 New York City needs to immediately  
14 examine all methods available to improve  
15 private waste collection, not just  
16 pursue a zone system without having an  
17 honest discussion about the upsides and  
18 the downsides. Chicago and Boston  
19 considered franchising and concluded  
20 that it would just proportionally hurt  
21 small businesses by decreasing the level  
22 of service and hurting workers who  
23 already experience barriers of  
24 employment because they have less than a  
25 high school education or were formally

1           incarcerated.

2           Chicago and Boston rejected zones  
3           and have engaged in strengthening  
4           standards of environmental and safety  
5           outcomes for those sanitation companies.  
6           Los Angeles, just like the current  
7           process that we are experiencing in New  
8           York, did not seriously look at the cost  
9           of franchising.

10          Their city's process, like ours, was  
11          not forthcoming with the hidden cost  
12          associated with franchising and made  
13          promises of lower prices and improved  
14          service that only resulted in the  
15          doubling and tripling and quadrupling of  
16          prices. Particularly hurt were small  
17          businesses who report that they've had  
18          to close off employment opportunities to  
19          those who need the job most.

20          And most importantly, Intro 996  
21          works to find solutions that we believe  
22          can immediately stop the carnage on our  
23          streets. I believe that we can avoid  
24          future accidents if we stop the  
25          condemnation, finger-pointing and

1 political outmaneuvering, and if we did  
2 our jobs in government to pass common  
3 sense reform now. Thank you.

4 MR. ARRONA: Thank you, Counsel  
5 Member Cornegy. The next speaker is  
6 Jose Maldonado.

7 MR. MALDONADO: Good morning, and  
8 thank you for the opportunity to offer  
9 testimony on behalf of New Yorkers for  
10 Responsible Waste Management. My name  
11 is Joe Maldonado. I'm testifying on  
12 behalf of the Association's Executive  
13 Director, Kendall Christiansen.

14 New Yorkers for Responsible Waste  
15 Management respects and appreciates the  
16 efforts of the Business Integrity  
17 Commission to propose new laws and  
18 updated regulations with respect to  
19 establishing best practices for all of  
20 BIC's licensees and registrants.

21 To date, all of the industry  
22 associations have been supportive and  
23 appreciative of BIC's leadership in  
24 making safety a top priority for all  
25 concerned, including facilitating

1 discussions with colleagues at other  
2 City agencies; like the Department of  
3 Sanitation, the Department of  
4 Transportation and the New York City  
5 Police Department, as well as  
6 collaborating on producing a series of  
7 safety symposia and a handbook on best  
8 practices.

9 This initial set of proposed  
10 regulations are generally thoughtful and  
11 appropriate. They speak primarily to  
12 requiring better recordkeeping, timely  
13 notification to BIC of various events  
14 involving other agencies, as well as  
15 crashes of all types and maintenance of  
16 policies and procedures that effectively  
17 integrate a wide range of compliance  
18 requirements into company practices.  
19 Others will speak to particular concerns  
20 that should be considered and resolved.

21 Should these regulations be adopted  
22 and formed similar to what is proposed,  
23 we expect that the industry's  
24 associations will work with our  
25 respective members to provide active

1 guidance regarding compliance with any  
2 new requirements and will work with BIC  
3 to produce guidance documents, workshops  
4 and other means of assisting the  
5 industry in meeting our obligations.

6 As the number and nature of these  
7 types of requirements expand, it should  
8 be understood that licensees must devote  
9 additional time and resources to  
10 compliance-related matters, which will  
11 increase administrative costs for  
12 licensees and registrants. If it is not  
13 otherwise clear in BIC regulations,  
14 guidance should be provided as to the  
15 electronic maintenance of records and  
16 conveyance of them to BIC, including  
17 through electronic portals that enable  
18 real-time updates to company records.

19 Specifically, the maintenance of  
20 policies and procedures should be clear  
21 as to whether they need to be provided  
22 proactively to BIC or made available on  
23 a timely basis upon request.

24 For the sake of discussion, the  
25 collection of data of the type outlined



1 by the proposed regulations begs at  
2 least two questions worthy of further  
3 review before they are finalized. The  
4 first is the harmonization of new  
5 reporting requirements with those of  
6 other federal, state and local  
7 regulatory agencies, so that compliance  
8 can be both simplified and more  
9 effective. That means adopting similar  
10 definitions of "crash" and other  
11 incidents, and using the same reporting  
12 requirements and processes. In any  
13 event, the definition should be  
14 meaningful and rational and avoid  
15 sweeping in inconsequential information.

16 The second question is the question  
17 of BIC's current capacity to receive,  
18 analyze, and assess additional data of  
19 the types requested, given the  
20 presumption that they are requested for  
21 rational purposes not fully clear within  
22 the language of the proposed  
23 regulations. If the purpose of the data  
24 collection exercise is to provide a  
25 better snapshot as to industry

1 performance, the capacity to assess and  
2 issue reports should be considered, and  
3 to use those benchmarks for industry  
4 performance. For example, similar to  
5 the crash report prepared by DCAS for  
6 City-agency fleets, will reports be  
7 produced? Will new data be included in  
8 the Mayor's management report?

9 If, in fact, the purpose is to  
10 provide BIC with additional information  
11 related to the performance of individual  
12 companies, especially during  
13 license-renewal processes or under  
14 special circumstances outside of the  
15 renewal process, the use of the  
16 information should be clearly explained  
17 and discussed further. The corollary is  
18 that due consideration should be given  
19 to privacy and other proprietary  
20 business information, considerations  
21 regarding certain data that will be  
22 collected by BIC.

23 Now, with respect to insurance  
24 requirements, given that insurance  
25 markets require a comprehensive and

1           timely understanding of external markets  
2           through which insurances are obtained,  
3           we respectfully suggest that BIC engage  
4           in dialogue with knowledgeable experts  
5           regarding its proposals and how to make  
6           them more effective in light of industry  
7           standards and requirements. It has been  
8           suggested, for example, that liability  
9           insurance is typically sold in  
10          one-million dollar increments, making  
11          the proposed requirement -- or the  
12          current proposed requirement --  
13          of \$1.5 million not standard and,  
14          therefore, difficult to comply with.

15                 Additionally, the insurance  
16          requirements that are proposed need to  
17          take into account that some larger  
18          companies insure through other legal and  
19          appropriate means, including  
20          self-insurance and other types of risk  
21          pools, which the existing and proposed  
22          language may not adequately recognize.

23                 Overall, we strongly encourage an  
24          ongoing, collaborative process for  
25          consideration of any new regulations, as

1 well as proposed legislation, especially  
2 as various proposals are introduced by  
3 other concerned stakeholders, as we have  
4 experienced with BIC over the past two  
5 years through the Trade Waste Advisory  
6 Board and the working group convened  
7 under the Department of Sanitation's  
8 Advisory Board offers this.

9 The industry's commitment, both  
10 nationally and locally, to improve  
11 standards, technologies and practices  
12 with respect to improving safety is  
13 considerable. But those mutual goals  
14 are best pursued and achieved when  
15 rational and thoughtful people work  
16 together, and not when safety becomes  
17 politicized and weaponized or imposed by  
18 one party on another as part of a larger  
19 agenda.

20 As initially suggested, these  
21 proposed regulations should be  
22 considered in conjunction with the laws  
23 that BIC will be proposing. The new  
24 laws should include ideas from  
25 stakeholders, including the industry,

1 and focus on what is most likely to make  
2 an effective difference in actual safety  
3 of the general public and industry  
4 employees.

5 Finally, while we understand BIC's  
6 focus is on its licensees and  
7 registrants, consideration should be  
8 given to consistency as to how such  
9 reporting performance and insurance  
10 standards are applied to other  
11 transportation-related businesses that  
12 operate through various City licenses,  
13 including, but not limited to, school  
14 buses and delivery vehicles of all  
15 types. Thank you for the opportunity to  
16 comment on BIC's regulatory proposals.

17 MS. ANDERSON: Is there anyone else  
18 who would like to testify?

19 (No response.)

20 MS. ANDERSON: Seeing no one else is  
21 here to testify, we will now close the  
22 record for this hearing. As a reminder,  
23 the Commission will continue to accept  
24 written comments through the close of  
25 business. This hearing is now closed.

NYC - Business Integrity Commission  
September 17, 2018

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The time is now 10:50. Thank you.

(TIME NOTED: 10:50 a.m.)

NYC - Business Integrity Commission  
September 17, 2018

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1 C E R T I F I C A T E

2

3 STATE OF NEW YORK)

4 ss:

5 COUNTY OF NEW YORK)

6

7 I, Danielle Rivera, a shorthand reporter  
8 within and for the State of New York, do hereby  
9 certify that the within is a true and accurate  
10 transcript of the statement taken on  
11 September 17, 2018.

12 I further certify that I am not related to  
13 any of the parties to this action by blood or by  
14 marriage, and that I am in no way interested in  
15 the outcome of this matter.

16 IN WITNESS WHEREOF, I have hereunto set  
17 my hand this 17th day of September 2018.

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DANIELLE RIVERA

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