



In Opposition of Int. 1503 – Expansion of Organic Recycling Rules for Rat Mitigation Zones

Good morning. My name is Kevin Dugan and I am the Director of Government Affairs for the New York State Restaurant Association, a trade group that represents food and beverage establishments both in New York City and throughout New York State. We are submitting comments today in opposition of intro 1503 which would require all restaurants that are located in “rat mitigation zone” to have to take part in a commercial recycling program.

The Association is the largest hospitality trade association in the State of New York and it has advocated on behalf of its members for more than 80 years. Our members represent one of the largest constituencies regulated by the City as nearly every agency regulates restaurants in one aspect or another.

Restaurants employ hundreds of thousands of New Yorkers and are a backbone of the tourism trade here in New York City. To ensure the continued viability of the restaurant and hospitality industry, New York City must have sensible and reasonable regulations that protect consumers and the restaurants that serve them.

I am writing to you today to voice the industry’s opposition to what amounts to a further expansion of the commercial organic recycling rules in New York City and I am encouraging the City Council to take additional time to work out the vagueries of this proposal before taking any legislative action. There are simply too many unanswered questions in the current construction of this legislation for it to be considered for adoption. For example, while we are aware that these “rat mitigation zones” have yet to be created, this package of bills gives next to no clarification on the process by which these zones will be determined. We have no idea how big these zones will be. Nor any indication on when these zones will be created. All we know is that they will be determined relying on reports from the departments of Health and Sanitation which may lag behind any real world applicability. We are urging caution when it comes to passing this legislation encourage the Council to take a closer look at this language before doing so.

Restaurants in this City are already governed by Department of Sanitation rules when it comes to who is required to take part in organic recycling and who is exempt. These rules have recently been expanded to include more restaurants and we nobody has any idea on how these rules will economically impact the industry. It would be imprudent to include more and more food establishments in this program without further examining the impact this will have to the businesses bottom line. Businesses all over the City are struggling with higher rents, increased labor costs, more stringent scheduling rules and all sorts of other regulations that are still being phased in without any concern with how one effects the other. This approach needs to stop if restaurants have any hope of being financially viable within the five boroughs.

If the Council does decide to push through this legislation we encourage that a tax credit should be created to help ease the financial burden this will cause many of the restaurants effected. As was mentioned above, restaurants across the City have an inordinate amount of trouble making ends meet. The City often touts how business friendly it is, however this is something that is rarely seen in the restaurant industry. If the Council office truly want to help businesses help keep vermin out of the City, a tax credit in this situation would go a long way in helping restaurants in these districts implement stringent organic recycling protocols while ensuring they can remain in business.

In conclusion, the New York State Restaurant Association opposes Intro 1503 and urges the City Council to take our comments today into account before adopting this detrimental piece of legislation.

Respectfully Submitted,

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Director of Government Affairs

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