

Moving Toward Universal Recycling: Requiring Provision of Recycling Service at Commercial and Public Spaces at the Local Level

While single-family households have a relatively high level of access to recycling, access to recycling in public places, including non-residential buildings, and in multi-family dwellings, lags behind. Some local governments have passed ordinances to require building owners/managers to provide recycling in some of these locations and at special events. One mechanism some jurisdictions use is a universal recycling ordinance (see text box below). Other mechanisms include zoning/municipal code and permit requirements (e.g., buildings be designed with adequate space for recycling containers, and public events of a certain size obtain a permit), mandatory participation, and disposal bans. Examples are provided below.

- **Alameda County, CA** – All businesses and institutions, and multi-family complexes with five units or more are required to provide recycling on site, per [Ordinance 2012-01](#) (as amended). Other details include:
 - Mandated materials are: cardboard, newspaper, white paper, mixed paper, glass food and beverage containers, metal food and beverage containers, and PET (#1) and HDPE (#2) plastic bottles.
 - Property owners must ensure recycling/compost containers are of adequate volume – i.e., there is enough capacity to avoid overflow of containers at all times.
 - Property owners must ensure tenants/employees are informed of the program and how to properly participate. They must provide materials at least annually, and new employees are to be informed within 14 days of hire.
 - A plant debris disposal ban is also in place, that requires commercial, institutional, and multi-family complexes with more than five units to separate plant debris for organics collection.
 - Property owners are required to ensure materials are placed in bins properly and that no garbage is included in the recycling and organics bins.
- **Raleigh, NC** – Building code requirements state that commercial properties not classified as small businesses must plan for adequate space for trash dumpsters and cardboard recycling containers, at a minimum. Multi-family dwellings must also show adequate space for recycling containers.
- **San Diego, CA** – Not only are single-family residences, multi-family residences, and commercial buildings required to be provided with recycling services, and those living/working in those buildings required to separate materials for recycling, but recycling must also be provided at special events held on public property that require permits. Typical events include road races/walks, festivals, and parades. The ordinance stipulates that:
 - The number of recycling containers must equal the number of trash containers;
 - Recycling and trash containers must be placed next to each other, or “paired;”
 - Recycling containers must be clearly marked, and include a list of recyclable materials;
 - Event organizers can decide which materials are included, but must at least include aluminum and metal cans, glass, and plastic bottles and jars.
 - The event’s coordinator must ensure recyclables are delivered to a recycling facility.

WHAT IS UNIVERSAL RECYCLING?

True universal recycling requires that the opportunity to recycle materials is provided wherever the opportunity to dispose of waste is provided. This is sometimes referred to as “parallel access.” Universal recycling, as a policy, is usually implemented at the local level – and is often done so in combination with other best practices, such as:

- Pay as You Throw (PAYT),
- Building code design mandates that require multi-family dwellings and non-residential buildings to have adequate space for recycling (typically stipulating that it is co-located with trash and describing signage that must be on container(s), as well as education/outreach/training requirements) and
- Bundling of services.

Universal recycling may or may not be paired with mandatory participation – but it expands access to recycling with the responsibility on the property owner.

Boulder, Colorado – Universal Zero Waste Ordinance

Boulder, Colorado, adopted a "[Universal Zero Waste Ordinance](#)" in 2015. It was implemented the following year, and enforcement began in 2017. The ordinance requires all properties in the City to have separate collection for trash, recycling, and composting, and to hire a hauler to provide such services. Businesses must provide signage, place containers properly, and train employees. Property owners must regularly remind occupants where containers are located. Food service establishments must provide separate trash, recycling, and composting for customers with clear signage if they have "self-busing" dining areas. All businesses must report annually to the City. The City provides resources, such as a step-by-step compliance guide, downloadable signs, and free customization for signs. In certain circumstances property owners may be exempted from requirements of the ordinance.

Austin, Texas' Universal Recycling Ordinance

The City of Austin, Texas implemented a [Universal Recycling Ordinance](#) in an effort to support the City's zero waste goal. Requirements were phased in over time. For example, larger multi-family complexes had to provide on-site recycling immediately, whereas those of 5 to 10 units had four years to comply. Universal recycling at non-residential buildings was phased in based on squarefootage, with the largest required to immediately implement recycling. Multi-family complexes must include at least 6.4 gallons per week per residential unit of recycling capacity.

Austin's ordinance also requires food establishments to provide food scrap recovery. This requirement was also phased in based on the square footage of the food enterprise. Specifically, Austin's ordinance requires property owners/managers to provide:

- Sufficient recycling capacity at a convenient location for residents/employees;
- Collection of paper, plastics #1 & #2, aluminum, glass, and cardboard, at a minimum;
- Informational signage in English and Spanish (signage must include what is accepted, and include graphics to illustrate these materials);
- Recycling and compost containers that include chasing arrows symbol and are marked with "Recyclables" or "Organics" and the types of materials accepted, in English and Spanish;
- Trash containers labeled "Landfill Trash" in English and Spanish;
- Bilingual recycling education for tenants and employees (at least one per year, with new tenants/employees being educated within 30 days, and may include brochures, flyers, in-person meetings, e-mails, signs, etc.); and
- Online submission of an annual recycling and organics diversion plan (that describes garbage, recycling, and organics diversion services and education and outreach efforts planned for the site). Businesses receiving recycling collection services from the City of Austin are not required to submit a plan.

In Austin, multi-family dwellings include:

- Apartments
- Condominiums
- Mobile home parks
- Privately funded dorms
- Long-term nursing facilities
- Other residential apartments and multi-family properties

Violations of the URO (Austin City Code Chapter 15-6) are a Class C misdemeanor, punishable by fines up to \$2,000 per day, per offense.

Equal Space Requirements –

Some jurisdictions require new construction and renovation projects to have the same amount of space dedicated to recycling as to garbage. Examples of such jurisdictions include Boulder, CO; Broomfield, CO; and Charlotte, NC.

