

Moving Toward Universal Recycling – Requiring Provision of Recycling Service at Non-Residential and Multi-Family Buildings, Public Spaces & Events

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 that building owners/managers provide recycling in some of these locations. One mechanism some jurisdictions use is a universal recycling ordinance (see text box below). Other mechanisms include zoning/code requirements (e.g., that buildings be designed with adequate space for recycling containers), mandatory participation, and disposal bans. Examples include:

- **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 5 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 (at least 6 35-gallon carts on an x' by 12' pad).
- **San Diego, CA** – Not only are single-family residences, multi-family residences, and commercial buildings required to be provided with recycling services, per Article 6, Division 7, but recycling must 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.

STATES THAT REQUIRE EVENTS RECYCLING:

- + In California, [PRC 42648](#) requires large events (> 2,000 people or more including vendors, attendees, and others on site, and charge admission or are sponsored by public entity) to have recycling services, and to report diversion. AB 2176 was passed, in part, to encourage local governments to pass their own event recycling ordinances.
- + In Washington, [RCW 70. 93.093](#) requires beverage vendors at official gatherings and events to provide recycling for single-serving plastic, glass, and aluminum containers. Event organizers are also responsible for monitoring and servicing recycling bins during events and for having the recycled items hauled to a recycling and disposal station.

WHAT IS UNIVERSAL RECYCLING?

True universal recycling requires that the opportunity to recycle materials is provided wherever the opportunity to dispose of garbage 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, or bundling of services. Universal recycling typically does not require participation – but it expands access to recycling by requiring on-site collection of recyclables, typically with the onus on the property owner or manager, for non-residential and multi-family residential buildings. Some states, like **Delaware**, **Connecticut** and **Vermont** have universal recycling policies with varying expectations on local governments and service providers. Universal recycling also typically requires public spaces and events (such as festivals) to provide recycling opportunities.

Austin, Texas’ Universal Recycling Ordinance

The City of Austin, Texas implemented a [Universal Recycling Ordinance](#) with phased in requirements. 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 square footage, 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 that entities having food establishments on site also provide food scrap recovery, again, 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 diversion plan (that describes garbage and recycling 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

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; Charlotte, NC; and Vermont.

