

URO Stakeholder Meeting - 6/5/12 - Shredder Contracts

Primary Issues:

1. Rules require a minimum capacity for recycling services. How does a property owner receive a recycling service “credit” for the volume of materials collected through a shredding services contract?
2. Can a property owner use the recycling volumes collected by their tenants towards the minimum recycling capacity per site as required by the URO?

Owner is responsible for:

1. Providing sufficient recycling capacity to customers
2. Ensuring that private service providers report information on their behalf
3. Property Owners are required to file annual Recycling Plan form that notes how they will provide adequate recycling in the future.

Shredders are responsible for:

1. Reporting aggregate volumes diverted to the city on a semi-annual basis
2. Providing customers with service that helps them comply with the ordinance
3. Shredding companies are considered “Haulers” and must report volumes on a semi-annual basis on the materials collected in the past.

Questions to Shredders

Q1. Is shredded paper recycled?

Answer: If collected by a shredder, yes. If collected via a comingled recycling program, not necessarily. Sometimes the recycling processing systems are not able to recover the shredded paper since it may fall through the processing equipment

Q2. Is shredded paper weighed or is the volume tracked?

Answer: Yes. Normally customers are provided with an invoice after each collection – either by weight or by quantity of carts collected.

Q3. How does the billing relationship work?

Answer: Some shredders have contracts with entire buildings. A vast majority have multiple clients within a building. Many buildings have multiple shredding companies visiting one building. Some materials are collected on regular contracts and others are by request, or as needed.

Q4. Could the shredding company provide a document that summarizes the volume of materials collected to the property manager (property owner), even if the property manager is not a direct customer? The property owner could then use the information to request credit for recycling capacity when submitting the annual Recycling Plan form to the City. Note – the provider would **not** have to identify who is receiving the service, just the volume of material removed.

Answer: Not sure, there are concerns about privacy and contract agreements. BOMA also expressed concern that they would not feel comfortable asking tenants for the information themselves.

Possible Options Suggested by Stakeholders:

1. Ordinance amendment requiring tenants to report shredding volumes to their property management. *Note: Very few people liked this idea, but stated that it was an option.*
2. Require the property owner to contract with only one contractor. *Note: Very few people liked this idea, but stated that it was an option.*
3. Shredder provider submit aggregate amount per site to property owner, but does not include information on the tenant/customer using the service. *Note: This may still require some type of protection from the City.*
4. Develop a waiver or “credit” process. Service Provider encourages tenants to report their information to the property owner/manager. Property manager can report that information to the City in the annual recycling Plan form or verify that a certain percentage of tenants participate in a shredding program. The City would then give credit towards recycling capacity. This process could set the stage for other alternative compliance measurement and reporting to reduce the recycling capacity requirements. *Note: This idea seemed to have the most support from the stakeholders.*
5. Reevaluate the capacity standards. *Note: This idea has the most support from the stakeholders.*

Next Steps

- Discuss possible options with Law Department
- Revise DRAFT rules based on ideas presented at meetings (May 15 and June 5)
- Post updated DRAFT rules by close of business on June 14
- Conduct next stakeholder meeting on **June 21 at 9am, City Hall, Room 1029**
- Post rules no later than August 1, 2012