



DENVER
CLIMATE ACTION,
SUSTAINABILITY &
RESILIENCY

Waste No More Ordinance

City Council Business Committee

Ordinance Update Overview

March 19, 2025

Where are we in the process?



*All Task Force meetings were recorded and are open to the public.



Things to keep in mind...

Market Conditions – C&D



Need Haulers, Recycling Facilities, and Reuse

Haulers

- ✓ Plenty of haulers, roll-off rentals, and material recovery companies (25 C&D haulers currently licensed)

Recycling & Reuse

Depends on specific material and volumes

- ✓ Well covered for asphalt, concrete, and metal
- Questionable capacity to handle wood
- Likely have limited capacity for fixtures, carpet, ceiling tile, drywall, shingles, other architectural salvage

Market Conditions – Organic Waste



Need Haulers, Processing & Minimal Contamination

Haulers: Currently 6 licensed commercial haulers

Processing:

- Three facilities serving the metro area
- Contamination impacts cost & reduces the value of end products
- Compostable packaging increases contamination due to consumer confusion, currently very limited volumes accepted

Food Rescue:

- Donors are protected from liability through the [Bill Emerson Good Samaritan Act](#).
- Check out DDPHE's Food Donation Guide: www.Denvergov.org/FoodSafety

Market Conditions – Organic Waste Costs



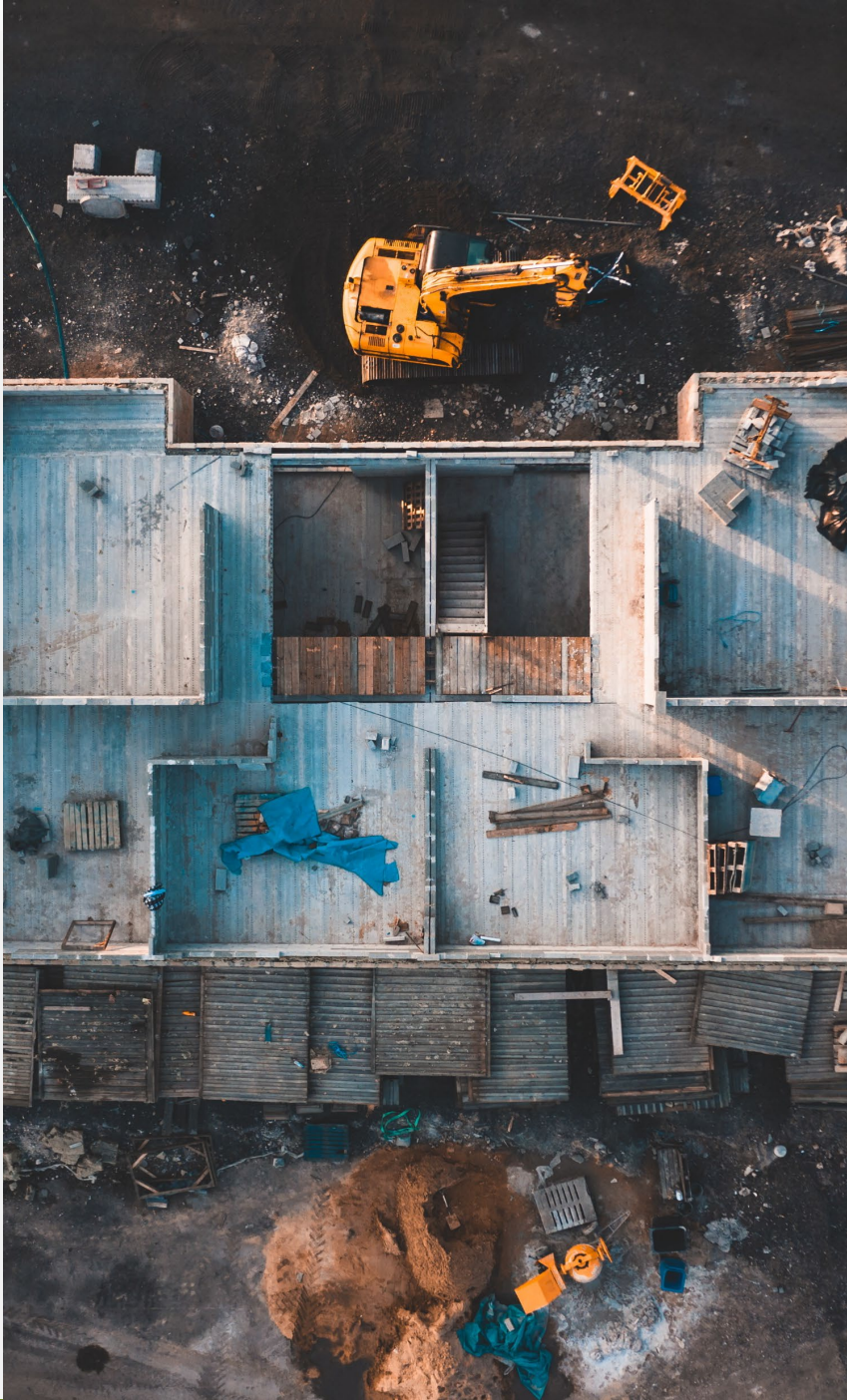
Cost impacted by many variables including container size, frequency of collection, & service routes

Organic waste collection examples:

- MF Residential: \$350-700/month
- Restaurant: \$120-\$490/month
- Event with 2,000 attendees & 5 staff support: \$1,750



Proposed Updates



Construction & Demolition



Construction & Demolition

Proposed Implementation Dates for Ordinance Changes	Notes	Task Force Recommendations
<p>April 1, 2026: All readily recyclable debris from covered list with a 50% diversion goal.</p> <p>Contractor must demonstrate 50% diversion by volume of total debris generated on site.</p>	<p>Concrete, asphalt, untreated wood, metal, or corrugated cardboard</p> <p>Additional materials to be included as markets develop</p> <p>Should revisit materials lists and diversion targets to align with market evolution</p>	<p>Original ordinance required recycling of covered materials.</p> <p>Task Force proposed adding a phased diversion goal:</p> <p>2025: 50% Diversion Goal 2028: 65% Diversion Goal 2030: 80% Diversion Goal</p>

Construction & Demolition– Applicability

Proposed Updates for Applicability & Exemptions	Notes
<p>Applies to demolition permits, residential and commercial construction permits</p> <p>Exemptions:</p> <ul style="list-style-type: none">• Hazardous materials• Projects under 500 square feet• Quick permits (ex: plumbing, electrical, HVAC)• Emergency orders from the city <p>Proposed new exemption for interior remodels under 2,500sf</p>	<p>Remodel exemption intended to reduce the economic burden and logistical challenges for small remodels that often do not result in significant volumes covered materials.</p> <p>Threshold aligns with neighboring communities</p>

Construction & Demolition– Compliance

Proposed Updates for Compliance	Notes
<p>Enforcement Agency: Community Planning & Development (CPD)</p> <p>Supporting Agency: Climate Action, Sustainability and Resiliency (CASR), Excise and License (EXL)</p>	<p>Performance security deposit & refund requirement</p> <p>Deposit amount TBD – intent is to support compliance while avoiding unintended impacts and minimizing up-front cost burden</p> <ul style="list-style-type: none">• Waste management plans during permitting, compliance reports at project completion• Pre-construction inspections to ensure sites are set-up for success• Contactor education & resources

C&D Diversion Rates

Table 3: Construction Waste by Material per m² of Gross Floor Area, National

Material	Weight Generated per GFA (kg/m ²)	Percentage Total by Weight	Volume Generated per GFA (m ³ /m ²)	Percentage Total by Volume
Asphalt	1.6	1.7%	0.004	1.0%
Cardboard/Paper	2.7	2.9%	0.046	12.7%
Concrete/Stone	37.4	39.8%	0.073	20.4%
Drywall	7.6	8.0%	0.025	7.0%
Foam/Insulation	0.1	0.1%	0.003	0.9%
Glass	0	0%	0	0%
Metal	5.6	6.0%	0.009	2.6%
Mixed Waste	3.6	3.9%	0.017	4.8%
Organics	0	0%	0	0.1%
Other	0.2	0.2%	0.001	0.2%
Plastic	1.2	1.2%	0.002	0.6%
Wood	20.5	21.8%	0.114	31.7%
Waste	13.5	14.3%	0.064	17.8%
Totals	94.0	100%	0.359	100%

Multi-Family Residential Construction Waste Analysis, LEED-certified projects, BC Housing, 2021

WNM Covered Materials = 68.4%

Source: <https://www.light-house.org/wp-content/uploads/2021/05/Residential-Construction-Waste-Analysis-May-27-2021.pdf>



Special Events

Special Events

Proposed Implementation Dates for Ordinance Changes	Notes	Task Force Recommendations
<p>April 1, 2026, for recycling and organic waste access for covered events</p> <p>2025, focus on education and adopting rules, regs, and administrative processes</p>	<p>Estimated to apply to up to 500 events/year</p> <p>Often multiple events on same days across the city during event season taking place on weekends and at night</p> <p>Concerns of note:</p> <ul style="list-style-type: none">• Number of service providers• Costs to community groups and small orgs• Contamination rates for organic waste	<p>January 1, 2025, recycling and organic waste access for all permitted events</p>

Events – Applicability & Exemptions

Proposed Updates for Applicability & Exemptions	Notes
<p>Applies to permitted events on public property (special events, street occupancy permits, tournaments, special occasions)</p> <p>Exemptions:</p> <ul style="list-style-type: none">• Events with 350 or fewer attendees• Events demonstrating de minimus waste generation• Proven economic hardship• Good faith effort to secure hauling services• Organics requirement based on presence of commercial food vendors for on-site consumption <p>Criteria for exemptions to be established through rules & regulations</p>	<p>Public process for developing rules & regulations</p> <p>Events with 350 or fewer attendees will be provided the same information and resources and will be encouraged to comply</p>

Events– Compliance

Proposed Updates for Compliance	Notes
<p>Waste Diversion Plans required and reviewed by the applicable permitting agency</p> <ul style="list-style-type: none">• Education requirements• Hauler information• Access and collection locations and practices <p>Enforcement Agencies: Office of Special Events (OSE), Denver Parks & Recreations (DPR), Department of Transportation & Infrastructure (DOTI)</p> <p>Support Agency: CASR</p>	<p>Civil penalties may be issued for non-compliance</p> <p>Resources, best practices, licensed haulers and service providers lists, etc. to be developed to support successful events</p>



Multi-Family Residential



Multi-Family Residential

Proposed Implementation Dates for Ordinance Changes	Notes	Task Force Recommendations
<p>April 1, 2026, for recycling & organic waste</p> <p>Exemptions:</p> <ul style="list-style-type: none">• de minimus waste generation• Economic hardship• Space constraints <p>Criteria for exemptions to be established through rules & regulations</p>	<p>Aligned with Colorado Extended Producer Responsibility program which will cover costs of recycling</p> <p>Single date for recycling and organics intended to avoid multiple redesigns of building collection systems</p>	<p>Require recycling and composting:</p> <ul style="list-style-type: none">• Jan 1, 2025, for 75+ units• June 1, 2025, for 25 - 74 units• Jan 1, 2026, for 8 - 24 units

Multi-Family Residential - Compliance

Proposed Updates for Compliance	Notes
<p>Waste diversion plan required</p> <ul style="list-style-type: none">• For rental properties, plans collected as part of licensing process or upon request• For buildings not subject to the rental licensing process, the plan must be provided upon request <p>Enforcement Agencies: EXL, CASR, CPD</p> <p>Supporting Agencies: DOTI, Department of Public Health & Environment (DPHE)</p>	<p>Educational and signage requirements</p> <p>Civil penalties may be issued for non-compliance</p> <p>Resources, best practices, licensed haulers and service providers lists, etc. to be developed to support successful MF program</p>



Non-Residential Buildings



Non-Residential Buildings–Dates

Proposed Implementation Dates for Ordinance Changes	Notes	Task Force Recommendations
April 1, 2026, recycling for all covered buildings (no organic waste required)	Aligned with proposed timing for MF Residential properties.	Require recycling no later than: January 1, 2025, for premises > 25,000 sq ft. June 1, 2025, for premises 5,000 - 25,000 sq ft January 1, 2026, for all non-residential premises.

Non-Residential Buildings – Applicability

Proposed Updates for Applicability & Exemptions	Notes
<p>Any building used for non-residential purposes</p> <p>Exemptions:</p> <ul style="list-style-type: none">• Parking garages, structures, vehicle depots and parking lots• Vacant lots or undeveloped land• Condemned properties• de minimus waste generation• Economic hardship or space constraints <p>Criteria for exemptions to be established through rules & regulations</p>	<p>Public process for developing rules & regs after updated ordinance is adopted.</p> <p>Regulations to consider non-residential uses that may have very low occupancy and/or do not currently have regular trash collection services.</p>

Non-Residential Buildings– Compliance

Proposed Updates for Applicability & Exemptions	Notes
<p>Waste diversion plan is required for all covered properties and must be provided upon request</p> <p>The proposed approach is to do proactive outreach combined with the ability to respond to complaints or notifications of non-compliance.</p> <p>Enforcement Agencies: CASR, CPD</p> <p>Supporting Agencies: DOTI, DPHE, EXL</p>	<p>No consistent touchpoint with a single agency.</p> <p>Civil penalties may be issued for non-compliance</p> <p>Resources, best practices, licensed haulers and service providers lists, etc. to be developed to support successful program</p>



Food Waste Producers



Food Waste Producers

Proposed Implementation Dates for Ordinance Changes	Notes	Task Force Recommendations
<p>April 1, 2026, recycling</p> <p>April 1, 2026, organic waste for businesses >15,000 sq ft</p> <p>April 1, 2027, organic waste for all others</p>	<p>Current concerns related to economic strain on restaurants and food prices.</p> <p>Significant opportunity to divert organic waste with low contamination rates</p> <p>Delayed implementation date for organics for smaller entities intended to reduce near-term cost burden</p>	<p>Require recycling and composting no later than:</p> <ul style="list-style-type: none"> • January 1, 2025, for businesses >15,000 sq ft • June 1, 2025, between 5,000 – 14,999 sq ft • January 1, 2026, for all others

Food Waste Producers– Applicability

Proposed Updates for Applicability & Exemptions	Notes
<p>Food processors, wholesale, warehouses, retail establishments</p> <p>Exemptions:</p> <ul style="list-style-type: none">• Food trucks, pushcarts, other mobile retail• Temporary retail food establishments• Food banks, shelters• Proven economic hardship• Space constraints• de minimis waste generation <p>Criteria for exemptions to be established through rules & regulations</p>	<p>Public process for developing rules & regulations</p>

Food Waste Producer– Compliance

Proposed Updates for Compliance	Notes
<p>Waste Diversion Plan required</p> <ul style="list-style-type: none">• Education requirements• Hauler information• Access and collection locations and practices <p>Verification in concert with DDPHE inspections and in response to complaints.</p> <p>Enforcement Agencies: EXL, DPHE Supporting Agency: CASR</p>	<p>Civil penalties may be issued for non-compliance</p> <p>Resources, best practices, licensed haulers and service providers lists, to be developed to support successful food waste producer program.</p>

Next Steps

Adoption Process:

- May 7, 2025: Business Committee Action Item
- May 26, 2025: Public Hearing

Agency Work Plan (2025/26):

- Incorporate feedback into final ordinance
- Admin rules & regulations
- Process and administrative systems
- Outreach and education
- Resources, guides & best practices
- Data collection & end market development strategies



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Q&A



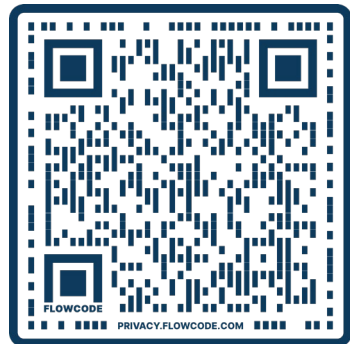
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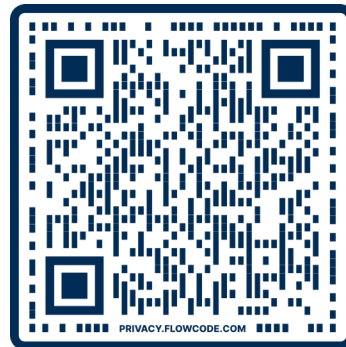
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