

## Title: USA REGULATED GARBAGE

### What happened

A managed vessel was inspected in the US by the USDA/APHIS (United States Department of Agriculture / Animal and Plant Health Inspection Service) and a remark was raised that US **regulated garbage** was not collected/stored onboard in “3 mil [0.003 inch] thickness” bags

- The US Code of Federal Regulations (CFR) defines “**regulated garbage**” as “*food scraps, table refuse, galley refuse, food wrappers or packaging materials, and other waste material from stores, food preparation areas, passengers' or crews' quarters, dining rooms, or any other areas [onboard]*”
- It requires such garbage to be “contained in tight, covered, leak-proof receptacles during storage on board” whilst in US waters
- All US garbage contractors are to sign a Compliance Agreement (CA) with APHIS which refers to procedures requiring that “*Plastic bags used in the collection [handling] or storage of regulated garbage must be a **minimum thickness of 3 mil [0.003-inch]** and must be of a unique color to identify them from plastic bags used to collect or store non-regulated garbage. Alternatively the plastic bags can be labeled [or tagged] to identify them as regulated garbage*”

Whilst the above requirement seems to be the onus on/ responsibility of the garbage contractor, ships need to assist compliance (preventing spillage, leaks and contamination) in order to avoid issues with APHIS inspections and/or increased costs imposed by the garbage contractors for repacking into thicker bags.



### Root causes/contributory factors

#### Root Causes and contributory factors:

- Organizational / Management Failure
  - Inadequate Procedure / Policy
- Equipment
  - Equipment design

## Proposed Corrective/Preventive Actions

### US going Vessels:

- Source garbage bags with minimal thickness of “3 mil [0.003 inch]”
- Contain regulated garbage in the above bags (identified by unique colour or labels/tags) in US waters

### Company:

- Share this Case Study as a lesson learned with all managed ships
- Advise
  - Purchasing Department of the above requirement
  - Shipowners
- Update eLVMS form SAF 77 “Worldwide Cruising Environmental Standards” accordingly

## References

- US CFR title 7, part 330, sections 401-403
- APHIS attachment to PPQ form 519 - Compliance Agreement and Guidelines for SOP on regulated garbage handling
- Leisure VMS procedures in: [Operations](#) > [Environmental Management](#) > [Garbage Management Plan \(MARPOL Annex V\)](#)
- Form SAF77 “Worldwide Cruising Environmental Standards”- Additional Areas – USA - Garbage
- Leisure VMS procedures in: [Operations](#) > [Ship Operations](#) > [Ship Administration](#) > [Requisition and Purchase](#)

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