

Guidelines for Writing Operating Procedures (OP) for Handling APHIS Regulated Garbage

The operating procedure for handling regulated garbage for your company should enable any inspector from the Animal and Plant Health Inspection Service (APHIS) and/or Customs and Border Protection (CBP) to easily identify your company's approved procedures during monitoring. The operating procedure must be approved by APHIS for inclusion in the establishment's compliance agreement. The operating procedures should be sufficiently detailed to train any establishment employee involved in the regulated garbage handling activities outlined in the compliance agreement. **Please note: Only include information related to handling regulated garbage in the operating procedure. Do not include extraneous information not related to regulated garbage. See [Sample APHIS Regulated Garbage Operating Procedures](#).**

The following information should be included in operating procedures for the establishment to handle regulated garbage:

1. The establishment must provide a description, as applicable, of the steps in the handling of regulated garbage from the collection, transportation, and storage, up to the final disposition of the regulated garbage or up to handing off to another authorized compliance agreement holder. If applicable, the establishment must include procedures to keep regulated garbage separated from non-regulated garbage throughout the process.
 - Please note: If your company uses contractors, you should indicate where they are working and what duties these contractors are responsible for.
 - Please note: If a company will be performing a service for your company, such as hauling or processing your regulated garbage, but they have their own compliance agreement, they are not considered by APHIS to be sub-contractors. If your company is planning on using a sub-contractor, this means that the sub-contractor will operate under your company's compliance agreement and your company takes responsibility and liability for their actions.
 - Please note: All sub-contractors must be approved prior to inclusion in the primary company's compliance agreement except stevedores or longshoremen.
2. Methods of collection of regulated garbage
 - Plastic bags must be at least 3 mil thick and must be of a unique color to identify them from plastic bags used to collect or store non-regulated garbage. Seal the bag. Alternatively, the plastic bags can be tagged or labeled to identify them as regulated garbage.

- Containers used to collect and store regulated garbage must be tight, covered, leak-proof and be uniquely identified outside the container and if words are used, marked with “REGULATED GARBAGE” or a similar acceptable phrase in English and any appropriate foreign language.
 - Clarify what areas of the aircraft or vessel from which your company will be collecting regulated garbage, if applicable.
 - Describe the methods of transferring regulated garbage from an aircraft or vessel to your company, or taking custody of regulated garbage from another company, if applicable.
3. Methods of transport of regulated garbage (including a description of the transport vehicle if applicable).
 - If a transport vehicle will be used, the vehicle must be fully enclosed, lockable, labeled “Regulated Garbage” or some other acceptable phrase, and have floors and surfaces which are impervious to liquids and can be adequately cleaned and disinfected.
 - If regulated garbage and non-regulated garbage will be transported in the same vehicle, then include a description of how regulated garbage will be identified and segregated from non-regulated garbage during transport.
 4. Methods and length of time of storage of regulated garbage (describe, as applicable, secure, dedicated storage space on the premises for the regulated garbage).
 - Storage location must allow regulated garbage to be segregated from non-regulated garbage and must be adequately labeled.
 - Surfaces of storage area location must be capable of being cleaned and disinfected.
 - The maximum storage time allowed by APHIS for regulated garbage is 72 hours. Describe how your facility will ensure that regulated garbage is not stored for longer than 72 hours.
 5. Name, address, and phone number of the primary caterer, hauler, storage facility, and/or processor who will pick up or receive the regulated garbage collected by your company (if applicable).
 6. Methods of processing of regulated garbage (this is applicable for establishments that are processors of regulated garbage).
 - Include information on operation of the processing equipment and processing procedures.
 - Include location where current processing procedures are posted.

7. A description of your cleaning and disinfection procedures. This includes but is not limited to:
 - Name of the APHIS authorized disinfectant that will be used to disinfect regulated garbage spills and contamination. An APHIS authorized disinfectant must be used to disinfect regulated garbage contamination except inside an aircraft.
 - Location in the facility or vehicle where the spill kit will be kept.
 - For what the establishment operating procedures should include at a minimum for cleaning and disinfection in food handling areas and in non-food handling areas, follow the instructions in [APHIS Authorized Disinfectants for Use When Handling APHIS Regulated Garbage](#).
 - For record keeping requirements for cleaning and disinfection of regulated garbage spills and contamination and routine use of disinfectants associated with regulated garbage handling, follow the instructions in [Guidelines for Regulated Garbage Record-Keeping](#).
 - Describe cleaning and disinfection (C&D) steps that will be used by your establishment or in your operation for cleaning and disinfecting regulated garbage spills and contamination (both outside and inside the conveyance, if applicable). Include information on cleaning and disinfection any non-disposable tools or equipment contaminated with regulated garbage, including tools used to clean and disinfect regulated garbage spills, and treating any disposable items used in the cleaning and disinfection of regulated garbage spills and contamination as regulated garbage. The procedures should reflect how C&D is actually performed at your facility.
8. Information on contacting CBP or PPQ in the event of a regulated garbage spill outside of the facility or aircraft.
9. Backup systems are not for routine use but are initiated in cases of emergency or other non-routine situations. If your establishment has been suspended, canceled, or otherwise is unable to conduct the regulated garbage handling activities as outlined in the Regulated Garbage (RG) Compliance Agreement (CA) activities, the backup system must be implemented. Additionally, if your primary regulated garbage handler is unavailable or your primary processor is inoperable, the backup system must be implemented, to ensure that regulated garbage is not stored at the establishment's facility for longer than 72 hours. The backup system must be outlined in the operating procedures. The establishment(s) serving as the backup(s) must also have a valid compliance agreement covering the same operational activity prior to inclusion on the compliance agreement. The backup(s) must be capable of handling the company's regulated garbage workload.