



December 20, 2018

TO: United Fresh Produce Association GAP Harmonized Standard Licensees

RE: Written interpretation of standard 1.10.5

In December 2018, an interpretation question was posed to the Calibration Committee of the Harmonized Standard regarding standard 1.10.5, as it pertains to situations in which septic system capabilities do not allow for the disposal of toilet paper (e.g., in regions of the world lacking this infrastructure). As it is written, there is currently no flexibility in the requirement to allow for toilet paper disposal into toilet paper waste baskets (though this flexibility is given in the FDA Produce Safety Rule Section 112.129(b)(3)). In considering these situations, the Calibration Committee agreed that the risk of using toilet paper waste baskets can be adequately managed in situations where toilet paper cannot be disposed of in a toilet. To allow for flexibility in the written standard until a time where the Harmonized Technical Working Group can approve a permanent change to the standard, the Calibration Committee has agreed to the following interpretation:

Operations using toilet paper waste baskets may be interpreted as **Compliant** with standard 1.10.5 **ONLY** in situations where adequate septic systems are unavailable in the country or region, thus requiring toilet paper disposal containers, provided the following:

- There is a clear, reasonable, and safe toilet paper disposal procedure to ensure the disposal does not become a food safety concern
- The disposal procedure is included in a documented risk assessment
- Toilet paper disposal containers are separate from towel waste containers
- In practice, auditors should observe cleanliness of the restrooms and document the mitigation strategies the company took for any issues of noncompliance (e.g., SOP in place for handling of toilet paper, box/container with lid is cleaned and sanitized if reused, regular monitoring/servicing of restrooms throughout the day, microbial monitoring w/in the restroom)

In the event that an auditor makes an observation of this practice before a more permanent change to the standard is made, the licensee/certification body can evaluate adherence to the interim solution. A proposed longer-term solution is provided on the next page. This will be evaluated by the Calibration Committee before being proposed to the Technical Working Group.

For more information on the Harmonized Standard, visit the United Fresh website (<https://www.unitedfresh.org/food-safety/gap-harmonization-initiative/>) or contact Dr. Emily Griep (egriep@unitedfresh.org).

1.10.5	<p>The practice of disposing of used toilet tissue on the floor, in trash receptacles, or in boxes is prohibited, except in countries/ regions where septic systems are not capable of handling toilet paper.</p>	<p>Operation shall instruct employees that used toilet tissue shall only be disposed of in the toilet.</p> <p>If toilet paper cannot be disposed of in the toilet, the use of toilet paper disposal containers are acceptable. Containers must be used only for toilet paper and must be distinguishable from towel waste containers. Operation shall develop SOPs for the disposal of toilet paper waste, ensuring adequate monitoring and cleaning frequencies to prevent unsanitary conditions.</p>	<p>Auditor observes restrooms for evidence of compliance.</p> <p>Auditor observes evidence or existence of toilet paper disposal, if applicable.</p>	<p>Retraining is preformed and documented.</p>
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