

Toilet Paper Disposal Summary

Discussed with Calibration Committee via email - 12/18/18

Scenario:

1.10.5 requires that all toilet tissue be disposed of in the toilet. There is not a written alternative to this written directly into the standard. Is there any way to have flexibility for countries that do not have similar plumbing capabilities, such as allowing for boxes with a lid, with proper waste management, documented risk assessment, etc. Has anyone run into this situation yet, and how do you deal with the NC?

Relevant Standard:

1.10.5	The practice of disposing of used toilet tissue on the floor, in trash receptacles, or in boxes is prohibited.	Operation shall instruct employees that used toilet tissue shall only be disposed of in the toilet.	Auditor observes restrooms for evidence of compliance.	Retraining is preformed and documented.
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Summarized Responses:

- Standards were originally written with modern facilities in mind, expecting that these facilities would not allow (or need) the wastebasket approach
- As it is written, there is currently no flexibility in the requirement; auditor would have to note non-compliance
- Agreement of the Calibration Committee that the written standard is applicable in the US and in areas with adequate septic systems, but not appropriate for other areas, where risk could realistically be managed and documented
 - Therefore, there is a need to rethink standards for broader use in these areas
- Worth noting – PSR Section 112.129(b)(3) allows for flexibility:
 - (b) *Your toilet facilities must be designed, located, and maintained to:*
 - (3) *Provide for the sanitary disposal of waste and toilet paper.*

Decision:

- Standard 1.10.5 will be flagged for review during the formal Harmonized Standard update process
- Standard may be interpreted as **Compliant** ONLY in situations where adequate septic systems are unavailable, 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
 - Toilet paper disposal containers are separate from towel waste containers
 - The disposal procedure is included in a documented risk assessment
 - **Note:** Auditor 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)
- When crafting the wording of the permanent requirement, committee should take into consideration language that will prevent the allowance of toilet paper disposal in wastebaskets as a way to eliminate the need to upgrade septic systems to adequate capacity (i.e. for operations that have adequate septic systems to handle toilet paper, but is simply not designed for the high volume of employees.)

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<ul style="list-style-type: none"> 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 situations 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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** Will be reworted so that feminine hygiene products are not prohibited from being thrown in w/ toilet paper waste