



**Ensuring Food Safety in Sushi:
A Comprehensive Look at Sushi rice acidification and HACCP
January 16th , 2024**

Agenda



Company Overview

Sushi Rice pH

Sushi HACCP

Challenges for Multi State Industry

Conference for Food Protection (CFP)



Sushi Rice acidification

Sushi Rice pH acidification requirements

- Specialized Process (Acidification) in food code 3-502.11
 - Acidification of TCS foods with the intent of making them non-TCS is considered a special process in the Food Code.
 - In the case of sushi rice, this process takes a TCS food (cooked rice) and adds acid (typically vinegar) to drop the pH and allow the cooked rice to be held without time or temperature controls.
 - This acid addition needs to adjust the equilibrium pH to less than 4.2 to control the identified hazards.
- Need to develop a HACCP plan
- Need a Variance from the HD were applicable
- Monitor the pH of sushi rice and can store the sushi rice at room temperature.

2022 Food Code

3-502 Specialized Processing Methods

3-502.11 Variance Requirement.

A FOOD ESTABLISHMENT shall obtain a VARIANCE from the REGULATORY AUTHORITY as specified in § 8-103.10 and under § 8-103.11 before: ^{Pf}

(A) Smoking FOOD as a method of FOOD preservation rather than as a method of flavor enhancement; ^{Pf}

(B) Curing FOOD; ^{Pf}

(C) Using FOOD ADDITIVES or adding components such as vinegar: ^{Pf}

(1) As a method of FOOD preservation rather than as a method of flavor enhancement, ^{Pf} or

(2) To render a FOOD so that it is not TIME/TEMPERATURE CONTROL OF SAFETY FOOD; ^{Pf}

Sushi Rice pH measurement Process

Steps for pH rice measurement not included. Please refer to CFP guidance document



Sushi HACCP

Sushi HACCP Flow Diagram - Standard

HACCP flow diagram Not included. Please refer to CFP guidance document.



Challenges for the Multi State Sushi Industry

Challenges for the Multi State Sushi Industry

Examples:

- **Different HACCP plan for the same process**
 - **Different acidification pH test requirements**
 - **Different cooling temperature requirements**
 - **Different pH limit requirements**
 - **Different CCP requirements**
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Conference for Food Protection (CFP)
[III_004_content_c.pdf \(foodprotect.org\)](http://www.foodprotect.org)

Why the need for CFP interference?

Inconsistencies in requirements for establishments that operates in multiple jurisdictions.

Examples:

- When a full HACCP plan and/or variance may be required
- Requirements for variance submittal
- pH value for acidification of rice
- Requirements for submitting sample to lab for pH verification
- Final cooling temperature of rice
- Labeling requirements
- Additional regulatory requirements, such as when seafood HACCP is required

2020 Submitted Issues related to Sushi Standardization

In 2023 CFP created – “Guidance Document for Retail Sushi HACCP Standardization”.
[III_004_content_c.pdf \(foodprotect.org\)](#)

CFP Guidance document Goal:

- The goal of this guidance is to help jurisdictions achieve a more standardized review of HACCP Plans.
- Uniform criteria for retail sushi HACCP plans allow for more consistent oversight for regulatory agencies and allows for training of food safety regulators on established critical control points across all facilities.
- Furthermore, this approach would help ensure that risks associated with the production of sushi at retail and food establishments were properly identified and addressed.



Guidance Document for Retail Sushi HACCP Standardization

[III_004_content_c.pdf \(foodprotect.org\)](http://www.foodprotect.org/III_004_content_c.pdf)



Open Discussion