



INFORMATIONAL BULLETIN No. 2021-01-09

**Sushi Rice HACCP Plan Submittal Guidelines**

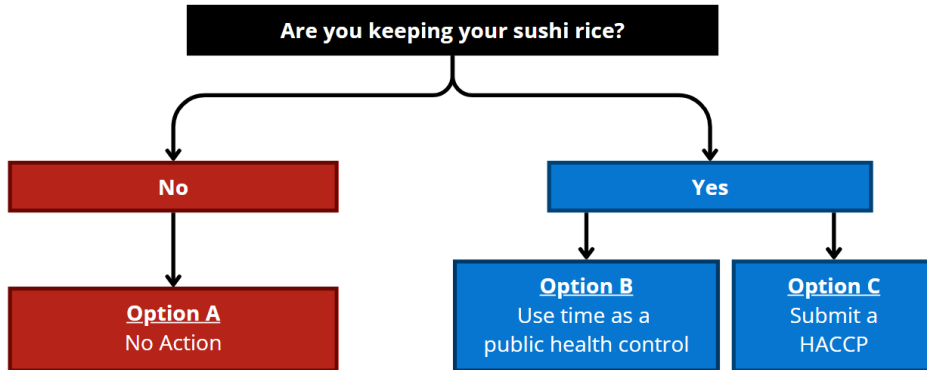
Sushi is a type of Japanese cuisine consisting of acidified rice combined with various toppings and fillings, usually raw fish or other ingredients. Sushi rice is generally kept at room temperature or in a warm holding unit in sushi restaurants for the ideal taste. The primary pathogens of concern associated with cooked rice are *Bacillus cereus* and *Staphylococcus aureus*.

Uncooked rice is often contaminated with *Bacillus cereus* bacteria from soil. The bacteria form spores that can survive normal cooking. *Staphylococcus aureus* is a toxin-producing bacterium commonly found on the skin, nose, and throat and can contaminate the food by poor hygiene of food handlers and improper food handling practices. If the cooked rice is kept out of temperature control, spores released by the bacteria can germinate and produce toxins that can make a person ill if consumed.

The control measure to keep the sushi rice safe at room temperature is the addition of a vinegar solution to reduce its pH to below 4.6 at which point the growth of harmful bacteria is inhibited. It is difficult to ensure the safety of sushi rice because each sushi chef uses his/her own recipe with differing amounts of the vinegar solution which may result in differing pH levels.

Pursuant to the California Retail Food Code (CalCode) Section 114419(3), a Hazard Analysis Critical Control Point (HACCP) plan is required when a food facility uses food additives or components such as vinegar to render a food non-potentially hazardous (food not requiring refrigeration to prevent microbial growth). When a food facility is making sushi rice, they must choose one of the following measures to be in compliance with CalCode:

- A.** Maintain sushi rice under refrigeration at or below 41°F or in a hot holding unit at or above 135°F.
- B.** Use "time only" control measures. Written procedures must be approved by this department and maintained at the facility for this department to review.
- C.** Develop and maintain a HACCP plan and submit plan to this department for review and approval.



Pursuant to CalCode Section 114000, time can be used in place of temperature control or pH control to keep un-acidified cooked rice at room temperature for **up to 4 hours**. The following criteria must be met if you are choosing Option B to keep and serve cooked rice at room temperature for a maximum of 4 hours:

1. The cooked rice container must be marked to indicate the time that cooked rice must be discarded if not used within 4 hours.
2. The cooked rice must be served or discarded within 4 hours from the point in time when the cooked rice is removed from temperature control. It may not be re-heated or refrigerated to be used after the 4-hour period.
3. A written procedure specifying time as a public health control must be approved by this office and a copy maintained at your facility and made available to the inspector upon request.
4. If at time of inspection, it is found that the approved procedures are not being followed as required (e.g. rice has not been marked with time of discard), the facility will no longer be allowed to use time as a public health control and a HACCP plan will need to be submitted.

**Important Note:**

- Cooked rice in an unmarked container is not allowed
- Cooked rice exceeding the 4-hour limit must be discarded

If cooked rice is acidified by adding vinegar (Option C), a HACCP plan is required to be submitted. A sample sushi rice HACCP plan has been included in this guideline along with a pH log to help facilitate the development of a sushi rice HACCP plan for your facility.



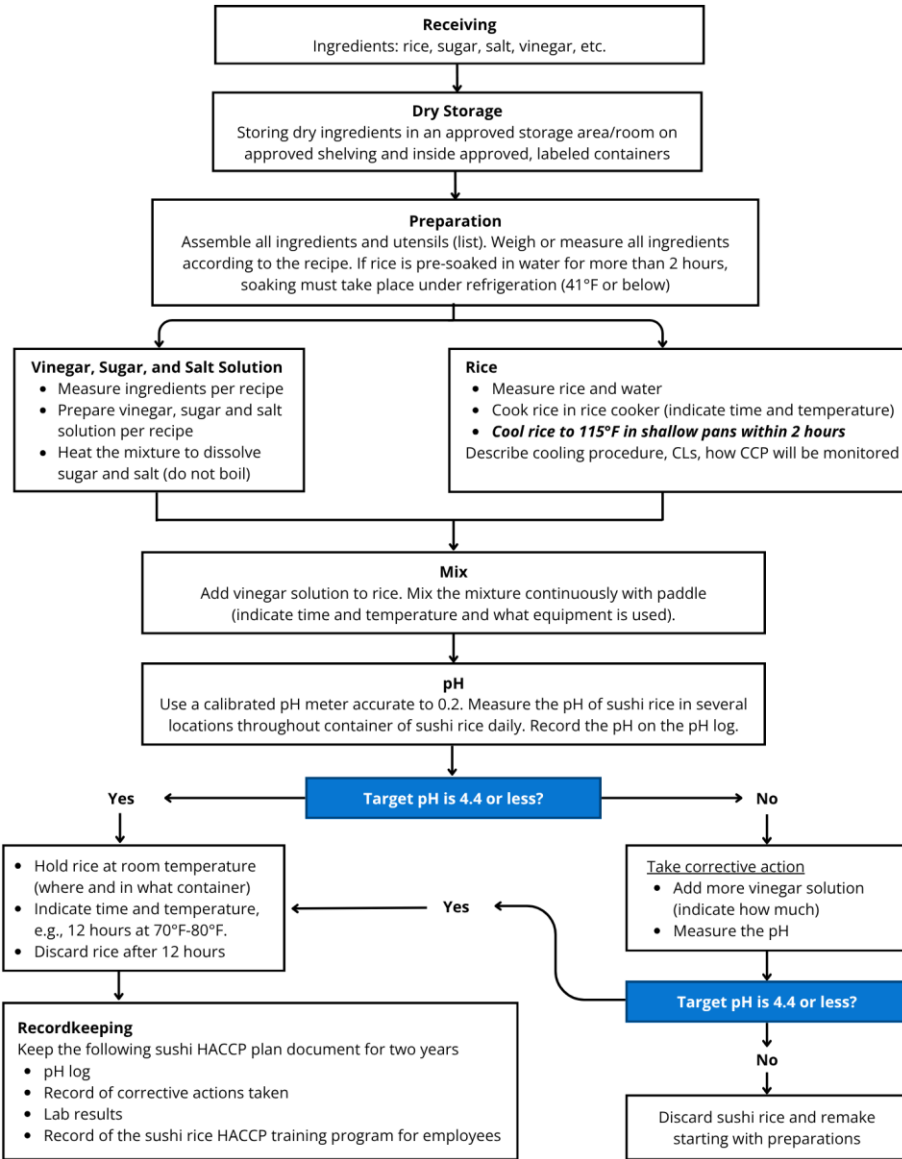
This HACCP plan may be used as a model to develop an individual HACCP plan specific to your operation. Please be advised that an incomplete HACCP plan or missing required information as listed below will result in rejection of the plan. The following must be included in the sushi rice HACCP plan:

1. Completed HACCP Application Submittal Form
2. A sushi rice HACCP plan (see sample sushi rice HACCP plan)



**Model Sushi Rice Procedure Overflow**

*Italic font indicates Critical Control Point (CCP)*





**HACCP Plan Template for Acidification of Rice in Compliance with California Retail Food Code Requirements**

**Contents of a Hazard Analysis Critical Control Point (HACCP) Plan**

A HACCP plan is required when food additives or components, such as vinegar, are used to render a food non time/temperature control for safety food (food not requiring refrigeration to prevent microbial growth) such as sushi rice, according to the California Retail Food Code Section 114419. The HACCP plan shall indicate all the following pursuant to the California Retail Food Code section 114419.1.

The following must be included in the sushi rice HACCP Plan:

- A **categorization of the types of Potentially Hazardous Foods (PHF)** that are specified in the menu such as rice and fish and **identification of the pathogens of concern**.
- A **flow diagram** of the specific food identifying the Critical Control Points (CCPs) providing the following information:
  - Ingredients, materials, and equipment used in the preparation of that food.
  - Formulations or recipes that address the food safety concerns involved with that type of food and the methods to control for those concerns.
- A **recipe** or formulation for the sushi rice HACCP Plan which must include all of the following:
  - Type of rice, (for example “short grain”).
  - The concentration of the vinegar, (for example: 4 percent).
- **Methods** of cooking rice include the time and temperature. **Methods** of preparing vinegar mixture (for example: vinegar, salt, and sugar). **Method** of cooling cooked rice indicate time and temperature. **Method** of mixing rice and vinegar solution.
- Create HACCP Plan. Identify **Critical Control Points (CCPs)**. Identify your **Critical Limits (CL)**.
- **Methods** of measuring and the frequency of monitoring your CCP (for example: measuring the pH daily by using a pH meter accurate to +/- 0.2 or pH test strips accurate to +/-0.5).
- Describe the **corrective action** (for example: if the pH is not less than 4.1, more vinegar will be added to the sushi rice and the rice will be retested, after second test if pH is not less than 4.1, the rice is to be discarded).
- **Policy and procedures** regarding storage of sushi rice should indicate holding time and temperature (for example: eight hours at 70°F to 80°F). Describe **policy** regarding remaining sushi rice following the holding time (for example: discard leftover sushi rice after eight hours).
- Describe **policy** regarding record keeping. For example: all records for the sushi rice HACCP plan and the related documents are to be kept on-site for at least two years.

**Commented [EM1]:** Non TCS Food. This sentence is confusing to read. Not sure how to fix it.  
 - Comment from Leila on 7/7/22.



- **Sanitation Standard Operating Procedures (SSOPs)** including methods for food employee and supervisory training.
- Example of **consumer advisory** and **letter of guarantee** from seafood/fish supplier for parasite destruction.  
The method and frequency for the Person in Charge to routinely verify that the food employee is following standard operating procedures and monitoring critical control points.

HACCP Plan Template for Acidification of Rice in compliance with California Retail Food Code Requirements

**HACCP Plan Template for Acidification of Rice in compliance with California Retail Food Code Requirements**

**SAMPLE #1 Nigiri/Maki Roll (Raw Fish) and Sushi Rice HACCP**

HACCP Critical Control Points									
Critical Control Point (CCP)	Hazard (biological, physical, chemical)	Critical Limits (CL) for each CCP	Monitoring				Corrective action	Verification	Records
			What	How	When	Who			
Fish frozen for parasite destruction (Except tuna species that are exempt)	Biological - parasites in fish served raw or under cooked	Frozen to -4°F for seven days	Freezing time and temperature	Letter from Supplier	Annually or before new supplier starts delivery	Manager	If no letter/ temperature log is available; fish will be cooked before serving	Letter from supplier/ temperature log	Current supplier letter/ frozen fish temp. logs available for two years
Rice acidification	Biological - spore forming <i>Bacillus cereus</i>	Rice pH ≤4.1	Rice pH	pH meter/ pH test strips Record pH and batch # on sushi rice log sheet	Measure pH of each batch 15 minutes after preparation	Sushi Chef	If pH is above 4.2 add vinegar one TBSP and stir. Recheck pH until pH is <4.2. Revise recipe to prevent need for future correction	Manager to check sushi rice log and pH meter calibration log daily	pH meter calibration log and sushi rice log available for two years.



**SAMPLE #2 Employee Hazard Analysis Critical Control Point (HACCP) TRAINING**

Procedures:

1. All employees will be trained to use the approved HACCP Plan.
2. Training covers critical control point identification, monitoring of critical control points, and corrective actions.
3. Log sheets will be used to monitor product critical control points during the preparation process.
4. The log sheets will be available at all times during operation for monitoring by management.
5. All employees will be trained in basic food safety including:
  - a. personal hygiene and proper hand washing.
  - b. Division of Public Health Food Employee Health Interview and Agreement for restriction and exclusion for foodborne illness exposure, symptoms, and/or diagnosis.
  - c. cleaning and sanitizing methods.
  - d. thermometer calibration.
  - e. use of pH test strips/use and calibration of a pH meter.
6. Employees will be retrained yearly or as needed for required corrective action.

**Commented [LJ2]:** Where can this be found?

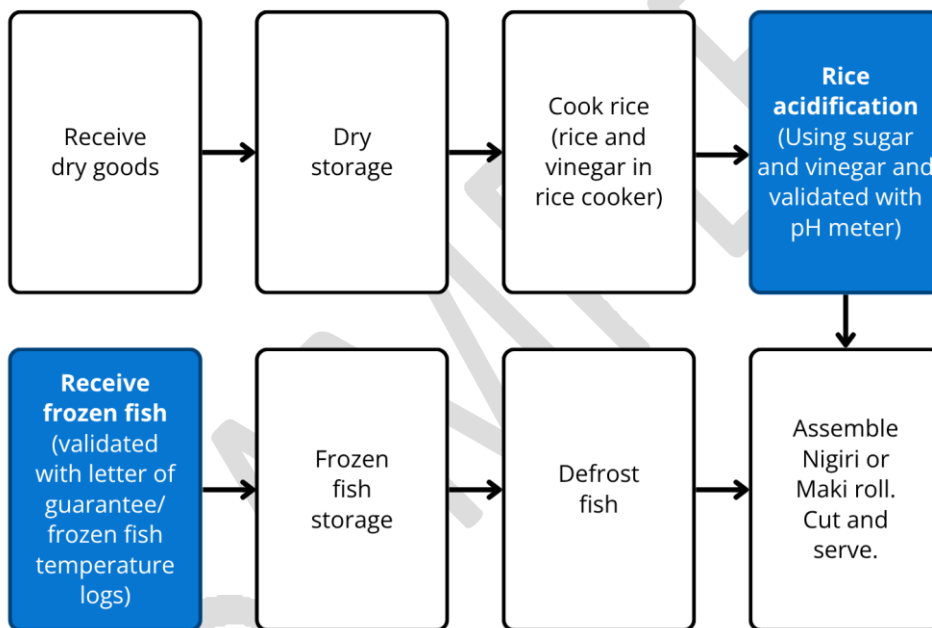
Training Log: (Employee Name)	
Training Type	Trainer Name and Date



**SAMPLE #3 Sushi Rice Flow Chart**

This analysis identifies the Critical Control Points (CCPs) in the preparation of two (2) foods (sushi rice and fish) that are time/temperature controlled for safety (TCS).

CCPs are shaded.





**SAMPLE #4 Example Ingredients and Recipe/ Methods**

**Ingredients:**

- Extra fancy (short grain) rice: 7 lbs.
- Water: 8 lbs.
- Distilled white vinegar (reduced to 4 percent acidity): 15 oz.
- Sugar: 12 oz.
- Salt: 5 oz.

**Equipment:**

- Rice cooker
- Thermometer
- pH meter
- Log sheets
- Clock

**Pre-Preparation:**

1. Assemble all ingredients and equipment.
2. Verify rice cooker is clean and in good repair. Dirty or damaged equipment can harbor bacteria and lead to foodborne illness.
3. Add 7 lbs. rice to pot and wash rice by agitating with clean gloved hands three times. Partially fill pot each time with water and visually inspect rice for physical contaminants. Remove any debris that may be present and drain water.
4. Add 8 lbs. from a potable water source taking into account the water added during the washing process. So, the total weight of rice and water is 15 lbs.

**Preparation:**

5. Put the rice into rice cooker until rice is thoroughly cooked, approximately 30 minutes. The rice will boil at 212°F. Be sure not to lift lid during cooking process. When the rice is cooked, the “keep warm” light will be on. The rice now is pasteurized, and all vegetative pathogens are reduced to a safe level. Spores for *Bacillus cereus* survive.
6. While the rice is cooking, combine the distilled white vinegar (reduced to 4 percent acidity), sugar, and salt into a small stainless-steel pot and heat the mixture until the sugar has dissolved (about 160°F), stirring constantly. Remove from heat and set aside.
7. Use spatula to empty rice cooker and put it into a large stainless-steel container or baking sheet. Be sure the rice container is clean and in good repair. Layer of rice in container cannot be greater than two inches in depth. Spread the rice evenly over the bottom with a stainless-steel spoon. Placing rice in a larger container speeds the cooling process and makes it easier to mix the vinegar mixture into the rice.
8. Run a spatula through the rice (about 80°F) using right and left slicing motions to separate the grains. At the same time, slowly add about 32 oz. vinegar mixture (about 80°F). Make sure all rice is evenly coated with vinegar mixture so that all rice reaches the appropriate pH (less or equal to 4.1). 32 oz. of vinegar mixture is added



to acidify the rice and add flavor. More vinegar mixture may be added if target pH (less than or equal to 4.1) is not reached. Let cool to room temperature (about 30 minutes).

9. Check the pH of the rice mixture by using a calibrated pH meter. The pH must be 4.1 or less to prevent the growth of *Bacillus Cereus*. If it is above the required range, add more vinegar mixture to it and repeat steps 7 and 8, and record the reading in the corrective action of the sushi rice pH log. The rice does not need to be refrigerated, because it is at a safe pH and is no longer a time/temperature control for safety (TCS) food. Keep covered to prevent drying. Sushi rice quality can last up to eight hours. After eight hours the sushi rice must be discarded.

**Critical Control Point:** A pH of 4.1 or below is used to control bacteria and must be strictly followed. So, it is a must to verify pH is 4.1 or below using a calibrated pH meter for each batch. Record pH on production log. The restaurant manager will review the record weekly.

#### Method for verifying pH:

1. After the rice is finished cooking, acidify immediately. Then, the finished rice is allowed to equilibrate for at least 30 minutes before pH is tested.
2. Gather a little rice from five different places in the rice container – (four corners and the middle). The amount is approximately ¼ cup or the size of a golf ball or a small red potato.
3. Place this ¼ cup of rice from the batch being tested into a clean cup.
4. Add ¼ cup of distilled water to the solo cup containing rice. The water should be at room temperature (approximately 77°F.). The cup will contain ½ water and ½ rice.
5. Manually mix the rice and distilled water in the cup with a spoon for about 10 seconds. Allow the mixture to stand for an additional 10 seconds.
6. Gently tilt the cup so that there is a separation of water from the rice.
7. Stick the pH meter tip into the liquid, trying to avoid touching the rice, to determine the pH level. Record the pH meter reading in column pH. The target pH is 4.1 or below.
8. If pH of the rice measures above 4.1, re-acidify until it is 4.1 or less.
9. Records are reviewed, signed, and dated for each batch of rice.

**Note:** A pH meter is required (or pH test strips that are in the acidic range). The pH meter must be calibrated at least once per week and documented. This is accomplished by dipping the meter in a buffer solution. The buffer solution should be chemically set to a specific pH level to get an accurate reading. Follow manufacturer's specifications for calibration.



**Preparation of Nigiri or Maki Roll:**

**Ingredients:**

Sushi rice  
Fish  
Other ingredients  
Seaweed wrap  
(Nori) Water

**Equipment:**

Plastic food service film  
Bamboo mat  
Small bowl

All the sushi chefs wear gloves each time they prepare the food. Bamboo and plastic mats are lined with plastic food service film and re-wrapped every four hours of continuous use and between contact with different sushi products. All mats are cleaned and sanitized daily. All cutting surfaces are cleaned to avoid cross contamination.

All approved fish are maintained in the freezer. When fish is needed, it is removed from the freezer and placed in the walk-in cooler (temperature  $\leq 41^{\circ}\text{F}$ ) to defrost. When they are totally defrosted, the package is opened and the fish is placed into the sushi case (temperature  $\leq 41^{\circ}\text{F}$ ), covering the fish with plastic to protect from possible contamination.

**Critical Control Point:** Fish are frozen at  $-4^{\circ}\text{F}$  or lower for seven days in accordance with parasite destruction regulations.

When the nigiri or maki roll order is placed, the fish that has been ordered will be taken out of sushi case, cut up, and used with the sushi rice which has been previously prepared. All the leftover fish in the sushi case are discarded within two days. All sushi rice will be thrown away if not used within eight hours. All knives, chopping boards, bamboo, and containers will be washed, rinsed, and sanitized to keep them clean between every order.







**Frozen Fish Log**

For in house parasite destruction, must maintain temperature of -4°F for at least 7 (seven) days.

Type of Fish	Day	Date	Temperature (°F)	Initials
	1			
	2			
	3			
	4			
	5			
	6			
	7			



**SAMPLE #6 Example Manufacturer Specifications**

Project: **SR-2363Z** Item No:

### 20-Cup Commercial Electric Rice Cooker



*Panasonic's Electric Rice Cooker is ideal for restaurants, banquets, supermarkets, cafeterias, and institutional applications.*

- Automatic Cooking Setting
- Superior Holding Capability
- Heavy Duty Non-Stick Coated Pan
- Locking Lid with Silicone Rubber Seal
- Magnetic Rice Scoop Holder

**Automatic Cooking Feature**  
This feature makes the rice cooker easy to use. It automatically cooks the rice and reheats to keep warm before when cooking is done.

**Superior Holding**  
Not only does it have a heater on the bottom but the sides too, to keep rice moist throughout the day.

**Heavy Duty Non-stick Coated Pan**  
Non-stick, removable coated pan makes for easy cleanup and helps prevent cooked rice from sticking.

**Locking Lid with Silicone Rubber Seal**  
Maintains airtight pressure and moisture to eliminate soggy and mushy rice for better tasting rice.

**Magnetic Rice Scoop Holder**  
For added convenience, the rice scoop holder can be attached to the body of the rice cooker.

**20-Cup Capacity**  
The SR-2363Z can cook up to approximately 50 - 60, 3/4 cup servings of dry rice.

**NSF Approved**  
The SR-2363Z is built with durability and attention to detail that has been tested and certified by the NSF International, The Public Health and Safety Company™ with the National Foundation.

**Easy-to-use Carrying Handles**  
Convenient carrying handles provides easy maneuverability and transportation.


**Multi-Language Operating Instructions**  
English/Chinese/Korean/Vietnamese



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Executive Office  
One Panasonic Way, Danbury, CT 06810  
www.panasonic.com/usa

### Product Specifications

#### FlashCheck Industrial Digital Probe Thermometer



**Measurement Range:** -8°F to 311°F (-4°C to 150°C)

**Accuracy:** ±1°F (0.5°C) at 100°F (37.8°C) or ±1.5°F (0.8°C) at 200°F (93.3°C) or ±1.5°F (0.8°C) at 300°F (148.9°C)

**Response Time:** 1 sec. (at 100°F) or 2 sec. (at 200°F) or 3 sec. (at 300°F)

**Resolution:** 0.1°F or 0.5°C

**Shipping Status/Weight:** 1.0" x 0.5" x 0.5" (25.4mm x 12.7mm x 12.7mm) 2.5 oz (70.9g)

**Waterproof Rating:** IP68

**Probe Length and Tip Diameter:** Stainless steel probe, length 12" or 18" or 24" or 30" or 36" or 42" or 48" or 54" or 60" or 66" or 72" or 78" or 84" or 90" or 96" or 102" or 108" or 114" or 120" or 126" or 132" or 138" or 144" or 150" or 156" or 162" or 168" or 174" or 180" or 186" or 192" or 198" or 204" or 210" or 216" or 222" or 228" or 234" or 240" or 246" or 252" or 258" or 264" or 270" or 276" or 282" or 288" or 294" or 300" or 306" or 312" or 318" or 324" or 330" or 336" or 342" or 348" or 354" or 360" or 366" or 372" or 378" or 384" or 390" or 396" or 402" or 408" or 414" or 420" or 426" or 432" or 438" or 444" or 450" or 456" or 462" or 468" or 474" or 480" or 486" or 492" or 498" or 504" or 510" or 516" or 522" or 528" or 534" or 540" or 546" or 552" or 558" or 564" or 570" or 576" or 582" or 588" or 594" or 600" or 606" or 612" or 618" or 624" or 630" or 636" or 642" or 648" or 654" or 660" or 666" or 672" or 678" or 684" or 690" or 696" or 702" or 708" or 714" or 720" or 726" or 732" or 738" or 744" or 750" or 756" or 762" or 768" or 774" or 780" or 786" or 792" or 798" or 804" or 810" or 816" or 822" or 828" or 834" or 840" or 846" or 852" or 858" or 864" or 870" or 876" or 882" or 888" or 894" or 900" or 906" or 912" or 918" or 924" or 930" or 936" or 942" or 948" or 954" or 960" or 966" or 972" or 978" or 984" or 990" or 996" or 1002" or 1008" or 1014" or 1020" or 1026" or 1032" or 1038" or 1044" or 1050" or 1056" or 1062" or 1068" or 1074" or 1080" or 1086" or 1092" or 1098" or 1104" or 1110" or 1116" or 1122" or 1128" or 1134" or 1140" or 1146" or 1152" or 1158" or 1164" or 1170" or 1176" or 1182" or 1188" or 1194" or 1200" or 1206" or 1212" or 1218" or 1224" or 1230" or 1236" or 1242" or 1248" or 1254" or 1260" or 1266" or 1272" or 1278" or 1284" or 1290" or 1296" or 1302" or 1308" or 1314" or 1320" or 1326" or 1332" or 1338" or 1344" or 1350" or 1356" or 1362" or 1368" or 1374" or 1380" or 1386" or 1392" or 1398" or 1404" or 1410" or 1416" or 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2088" or 2094" or 2100" or 2106" or 2112" or 2118" or 2124" or 2130" or 2136" or 2142" or 2148" or 2154" or 2160" or 2166" or 2172" or 2178" or 2184" or 2190" or 2196" or 2202" or 2208" or 2214" or 2220" or 2226" or 2232" or 2238" or 2244" or 2250" or 2256" or 2262" or 2268" or 2274" or 2280" or 2286" or 2292" or 2298" or 2304" or 2310" or 2316" or 2322" or 2328" or 2334" or 2340" or 2346" or 2352" or 2358" or 2364" or 2370" or 2376" or 2382" or 2388" or 2394" or 2400" or 2406" or 2412" or 2418" or 2424" or 2430" or 2436" or 2442" or 2448" or 2454" or 2460" or 2466" or 2472" or 2478" or 2484" or 2490" or 2496" or 2502" or 2508" or 2514" or 2520" or 2526" or 2532" or 2538" or 2544" or 2550" or 2556" or 2562" or 2568" or 2574" or 2580" or 2586" or 2592" or 2598" or 2604" or 2610" or 2616" or 2622" or 2628" or 2634" or 2640" or 2646" or 2652" or 2658" or 2664" or 2670" or 2676" or 2682" or 2688" or 2694" or 2700" or 2706" or 2712" or 2718" or 2724" or 2730" or 2736" or 2742" or 2748" or 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**SAMPLE #7 Consumer Advisory as Per California Retail Food Code Section 114093**

*\*Note the disclosure and the reminder*



**\*Bourbon Street Steak**  
A juicy, tender 10 oz. steak jazzed up with Cajun spices and served with sautéed onions & mushrooms. \$12.49

- FDA Disclosure
- FDA Reminder

\*NOTICE: Items marked with an \* may be cooked to order. Consuming raw or undercooked meat may increase your risk of foodborne illness.

To our guests with food sensitivities or allergies: Applebee's cannot ensure that menu items do not contain ingredients that might cause an allergic reaction. Please order with caution.

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**SAMPLE List of components of application for approval of a HACCP plan for (sushi) rice**

1. Hazard Analysis Critical Control Point Plan (See Sample #1)
2. Training plan (See Sample #2)
3. Flow chart for food preparation (See Sample #3)
4. Ingredients and recipes (See Sample #4)
5. Example logs (See Sample #5)
6. Manufacturer's specifications for equipment; including methods for calibration if necessary (rice cooker, thermometer, pH meter, pH test strips - See Sample #6 attachments)
7. Example consumer advisory that is in compliance with 114093 of the California Retail Food Code (See Sample #7) and note to advise on allergens if required