



**Public Health**  
Environmental Health Services

Trudy Raymundo  
Director

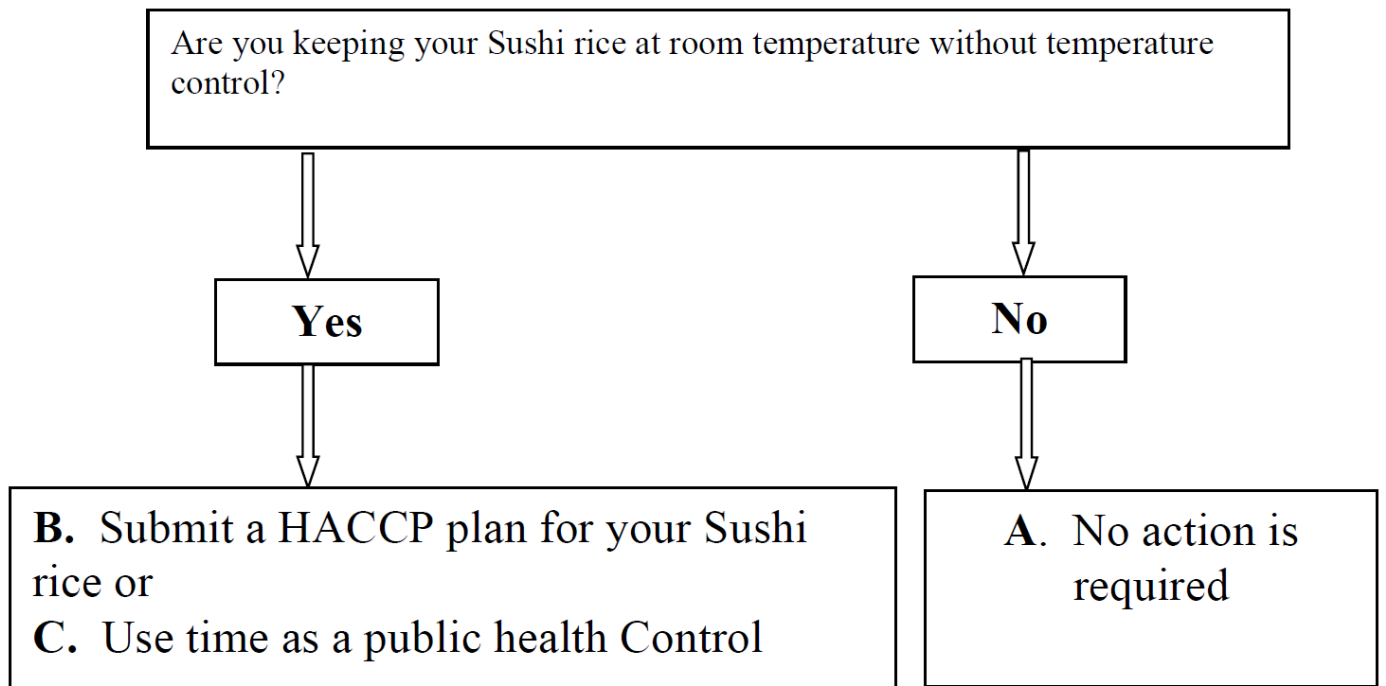
Maxwell Ohikhuare, M.D.  
Health Officer

Corwin Porter, MPH, REHS  
Division Chief

Dear Facility Owner/ Manager

Pursuant to California Retail Food Code {Section 114419.3 and 114000(a)} those food facilities that prepare Sushi rice and hold it at room temperature must take additional measures to ensure safety to those that consume it. Sushi rice is traditionally made by cooking the rice then adding vinegar. The vinegar acidifies the rice, lowering the pH. If the pH is maintained below 4.6, the rice is considered non- potentially hazardous. The operator must choose one of the following measures to be in compliance:

1. Maintain Sushi rice under refrigeration.
2. Develop and maintain a HACCP (Hazard Analysis Critical Control Point) plan. The HACCP plan must be submitted to this Division for review and approval.
3. Use" time only" control measures. Written procedures must be submitted to this Division for approval.



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- A.** No action is required if you keep cooked rice at 41°F or below or at 135°F or above.
- B.** A HACCP plan must be submitted for review and approval in order to acidify cooked rice by adding vinegar to render it a non-potentially hazardous food.
- To facilitate the development of a Sushi rice HACCP plan for your facility, a sample Sushi rice HACCP Plan and a pH log have been included. This HACCP plan may be used as a model to develop an individual HACCP plan specific to each operation. Please be advised that an incomplete HACCP Plan or missing required information as listed below will result in rejection of the Plan. A HACCP plan should include the following information/documents:
- Facility name, address, contact phone and the name of designated HACCP trained employee
  - A Sushi rice HACCP Plan (see sample Sushi rice HACCP Plan).
  - A verification letter from an accredited Laboratory indicating that the final pH of the Sushi rice is less than 4.6 (See attached list of accredited laboratories).

Please submit the Sushi rice HACCP plan by mail or email to this Division using the following address:

San Bernardino County Department of Public Health  
Division of Environmental Health Services Attention: Sumedha Singh, REHS  
385 N. Arrowhead Ave, 2nd Floor San Bernardino, CA 92415-0160  
E-mail address: [Sumedha.Singh@dph.sbcounty.gov](mailto:Sumedha.Singh@dph.sbcounty.gov)

- C.** “Time only” can be used in place of temperature control or pH control, to ensure product safety pursuant to Cal Code section 114000. According to this section un-acidified cooked rice may be kept at the room temperature for up to 4 hours without using any temperature control equipment (hot or cold holding unit). The following must occur to keep and serve cooked rice at room temperature for a maximum of 4 hours:
- The cooked rice container must be marked to indicate the time that cooked rice must be discarded if not used within 4 hours.
  - The cooked rice must be served or discarded within four hours from the point in time when the cooked rice is removed from temperature control.
  - A written procedure specifying time as a public health control shall be maintained in your facility and made available to the inspector upon the request.

Important Note:

- Cooked rice in an unmarked container is not allowed.
- Cooked rice exceeding a four-hour limit must be discarded.

If “time only” as a control (option C) is not used, and cooked rice is acidified by adding vinegar (option B), then a HACCP plan must be submitted for Sushi rice to this Division **within 30 days of receiving this official notice.**

For further assistance or any questions regarding Sushi rice HACCP Plan, or for using time as a public health control, please contact the undersigned:

Sumedha Singh, REHS  
PH/Environmental Health Services 800-442-2283  
[Sumedha.Singh@dph.sbcounty.gov](mailto:Sumedha.Singh@dph.sbcounty.gov)



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**Guidelines for Validating a Sushi Rice HACCP Plan (Option B)**

According to the California Retail Food Code (CAL CODE), Article 5. Section 114419.3 (a) HACCP plan is required when food additives or components, such as vinegar, is used to render a food non Potentially Hazardous such as Sushi rice. The HACCP plan shall indicate all of the following pursuant to CAL CODE section 114419.1:

- Ingredients, materials and equipment
- Formulation or recipes
- A trained, designated food employee
- Standard Operating Procedures that includes the following:
  - Critical Control Point (CCP)
  - Critical Limits
  - The method and frequency for monitoring the CCP
  - Corrective Action to be taken
  - The method and frequency for verifying a HACCP Plan
  - Record Keeping

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

- 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: 5 %)
- Methods of cooking rice, including the time and temperature.
- Methods of preparing mixture of vinegar, salt, and sugar.
- Method of cooling cooked rice, indicating time and temperature.
- Method of mixing rice and vinegar solution.
- Identify the Critical Control Points e.g. (adding vinegar).
- Identify your Critical Limits (target pH is < 4.4 and must not reach critical limits > 4.6).
- The pH of the Sushi rice must be initially validated by an Accredited Laboratory to indicate the final target pH is 4.4 or less, and does not exceed 4.6 (include laboratory result with submitted plan).
- Methods of measuring and the frequency of monitoring your CCP (for example: measuring the pH daily by using a pH meter or pH test strip paper accurate to 0.2 -0.3).

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- Describe your Corrective action (for example: if the pH is not less than 4.4, the Sushi rice will be discarded or more vinegar will be added).
- Policy and procedures regarding storage of Sushi rice should indicate holding time and temperature (for example: 12 hours at 70° F -80° F).
- A sample of Sushi rice must be sent for pH testing to an accredited Laboratory when:
  - Changing recipe or ingredients (for example: changing the type of rice or vinegar)
  - Annually, after the initial submission of the HACCP Plan
- Describe policy regarding leftovers of the Sushi rice (for example: discard leftover Sushi rice after 12 hours).
- Describe policy regarding record keeping, for example: keeping a record of all Sushi rice HACCP plan related documents for at least 2 years.

### **Measuring The Acidity (pH) Of Sushi rice By Using a pH Test Strip Paper**

Monitoring the acidity of your Sushi rice is an essential part of your approved HACCP plan. You may follow the instructions below to measure the pH of your Sushi rice daily:

- Use a pH test strip accurate to 0.2 to 0.3
- Measure the acidity (pH) of your Sushi rice within 30 minutes after acidification (mixing the cooked rice and vinegar solution)
- Make a rice slurry by mixing  $\frac{3}{4}$  cup of distilled water and  $\frac{1}{4}$  cup of Sushi rice in a clear plastic or metal cup
- Stir the slurry (mixture) for 20 seconds
- Dip pH test strip into the liquid portion of the rice slurry (for time period as instructed by the test strip manufacturer)
- Compare the color of test strip to color chart
- Record the pH in pH log
- Add more vinegar if the pH of Sushi rice is more than 4.4

### **List of Laboratories measuring the pH of Sushi rice in San Bernardino County:**

- Ag Tech. (909) 464-2244
- Michaelson Laboratory: (562) 928-0553
- Public Health Laboratory: (909) 383-3000

Please be advised this list may not be inclusive and should not be considered an endorsement by this Division. Please contact the individual laboratories directly to obtain current information regarding their locations, fees, etc .

You may use the following Sushi Rice Flow Diagram as a guideline to develop and submit your Sushi Rice HACCP Plan to this Division. For additional information, please contact the following Environmental Health Specialist:

Sumedha Singh, R.E.H.S.  
 PH/Environmental Health  
 Services 800-442-2283  
 Sumedha.Singh@dph.sbcounty.gov



**Public Health**  
Environmental Health Services

[www.SBCounty.gov](http://www.SBCounty.gov)  
[www.SBCounty.gov/dph/dehs](http://www.SBCounty.gov/dph/dehs)

### Monthly Sushi Rice pH log

Keep a copy of pH log near the Sushi rice preparation area. Check the pH of Sushi rice daily by using a calibrated pH meter or pH test strip paper accurate to 0.2-0.3. If the pH of Sushi rice is above 4.4, record the corrective action in the last column.

**Facility Name:** \_\_\_\_\_ **Address:** \_\_\_\_\_

Date	pH of Sushi Rice (less than 4.4)	Corrective Action
1		
2		
3		
4		
5		
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