

Using Time as a Control for Sushi Rice Safety

(Written Procedure Required)



Sushi rice is a Time/Temperature Control for Safety (TCS) food unless an acidity of less than 4.2 is verified via an approved HACCP Plan. Once sushi rice is removed from temperature control, Time as a Control (TAC) may be used to prevent the growth of microorganisms. Under TAC, food that is removed from temperature control must be served within a maximum of 4 hours. Most bacteria do not grow or produce toxins within 4 hours from the time that the cooked rice is removed from temperature control. Sushi rice that is not served within the 4 hour limit must be discarded. Once TAC is used, sushi rice cannot be saved and placed in temperature control for later use.

When using time as a control to ensure sushi rice safety:

- Once sushi rice is removed from temperature control, it must be served within a maximum of 4 hours. At 4 hours, any remaining sushi rice must be discarded.
- The discard time must be marked on the container of sushi rice.
- Written procedures of how TAC is used must be available for inspection at the facility.
(Refer to a sample written procedure on the next page)

Frequently Asked Questions

1. How do I use TAC?

- Maintain a written procedure and keep it available onsite for the food inspector to review.
- Mark the discard time of the food on its container.
- Discard any remaining food after the 4 hour time limit.

2. What information should I put in the written procedures?

- Specify the name of the food(s) that are held using TAC.
- Explain how the cooked sushi rice is prepared prior to removal from temperature control.
- Specify when the food is going to be served or discarded.

3. Does my written procedure have to be approved by the health department?

- No, pre-approval of written procedures is not required by the Washington State Retail Food Code. However, food establishments are encouraged to work with the Snohomish County Health Department to develop a written procedure that will meet TAC requirements.

4. Can I save food that is held using TAC and use it later?

- No. Once the food is under TAC, the food must not be returned to temperature control, and it must be discarded after 4 hours.

5. Why is 4 hours the time limit in TAC?

- The 4 hour time limit is used in TAC because most pathogenic bacteria do not grow or produce toxins within the first 4 hours from the time the food is removed from temperature control.



Sample of written procedure when using TAC:

Name of establishment:	Date:
Address:	City: State:
Name of owner:	Phone #:
1. <u>Type of food(s) used under TAC.</u>	
<ul style="list-style-type: none"> ▪ <i>Sushi rice</i> 	
2. <u>Procedure: how the food is prepared prior to removal from temperature control.</u>	
<ul style="list-style-type: none"> ▪ <i>Rice is cooked to a temperature above 135°F. While rice is still hot, vinegar is added, creating sushi rice.</i> ▪ <i>After vinegar is added, the sushi rice container is marked with the sushi rice discard time (not to exceed 4 hours)</i> 	
3. <u>Specify corrective action to be taken if TAC is not used properly.</u>	
<ul style="list-style-type: none"> ▪ <i>All sushi rice that is not served within 4 hours will be discarded.</i> ▪ <i>Any sushi rice that is found in an unmarked container will be discarded.</i> 	
Name: _____ Signature: _____ Date: _____	

Alternative ways to ensure sushi rice safety:

- **Use temperature control:** Keep sushi rice hot, above 135°F (hot holding) or cold, below 41°F (cold holding)
- **Use an approved HACCP Plan to render the sushi rice non-Time/Temperature Control for Safety:** Foods can be acidified with vinegar to a pH of 4.2 or lower to prevent microbial growth. A HACCP and variance review is required for this method, which requires Plan Review with application fees and an approval letter from the Snohomish County Health Department. For more information, please see our [Acidification of Sushi Rice for Food Safety and HACCP Plan Guide](#).

Always maintain safe food handling practices by avoiding bare-hand contact and cross contamination when working with both raw and ready-to-eat food.

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