

GUIDANCE ON INFORMATION TO BE INCLUDED IN A VARIANCE REQUEST TO ACIDIFY SUSHI RICE

Special Process: Acidification of Sushi Rice to make rice shelf stable.

As a minimum, the following information must be included in the plan.

1. Type of food establishment requesting variance –
 Restaurant Sushi producer operating in a food store other? Describe _____
2. How used? sushi rolls bowls other? Describe _____
3. Immediate service advance prep for later service Packaged for retail sale other? Describe _____

4. Will product be sent to another retail operation for sale or service Yes* No
*If yes, contact the CT Department of Consumer Protection Food & Standards Division for information on obtaining a manufacturer's license.
860-713-6160. <https://portal.ct.gov/DCP/License-Services-Division/All-License-Applications/Food-Licensing-and-Registration>
5. Floor plan showing basic equipment – sinks, prep and storage areas, etc. provided
6. Name of Person(s) in Charge/Certified Food Protection Manager(s) _____
7. Provide valid CFPM certificate(s) for each.
8. Type of rice: White rice Brown rice Whole grain Other _____
9. Vinegar Strength ____ % and Brand: _____
10. Detailed step by step description of procedure of how rice is made [recipe with volumes] and acidified including who will prepare it for each type of rice you intend on acidifying.
11. Shelf life of rice? (after what time is it discarded?)
12. Provide copy of the menu, placard, or both as required. Be sure Consumer Advisory is included if raw or undercooked animal products (typically seafood) are included in the sushi rolls – provide both the reminder and disclosure components. (See Section 3-603.11 of the FDA Code)
13. Provide a complete ingredient list.
14. If fish requiring parasite destruction will be included in sushi rolls, provide Letter of Guarantee of parasite destruction from vendor(s). (Within 1 year and renew annually)
15. Diagram of facility layout with identification of dedicated workspace and equipment, sinks, etc.
16. **Flow chart** Provide flow diagram that shows each step from receiving raw ingredients through final service and storage. You may wish to have one flow chart for rice and another for the product (sushi rolls) or they may be combined. Flow chart must include each specific step including cooking, filling, cooling, packaging, and holding as appropriate. Indicate which steps are CCPs.
17. **Hazard analysis** Provide chart that indicates what the specific hazards - physical, chemical, and biological - are and how they will be addressed. Be sure to include *Germination of Bacillus cereus spores, B. cereus cellular growth and toxin formation* and other biological hazards as applicable. Indicate which steps are critical control points (CCPs), their Critical Limits (CLs), and how the hazard(s) will be controlled. Also include a hazard analysis for the other ingredients in the sushi rolls – seafood, vegetables, etc.
18. Cooling and cold holding procedures of final product if made in advance and held in cooler at restaurant (not packaged)
19. Shelf life of acidified rice ____ (discard after how many hours?)
20. If packaged for retail sale:
 - Indicate how product will be date marked and its shelf life.

- Cooling and cold holding procedures of final packaged product
- Provide sample labels that state if raw or undercooked animal foods are present and list allergen information as required. Allergens are: milk, egg, fish (e.g., bass, flounder, or cod), Crustacean shellfish (e.g., crab, lobster, or shrimp), tree nuts (e.g., almonds, pecans, or walnuts), wheat, peanuts, soybeans, and sesame.

Acidification

21. What is the Critical Limit (CL) for acidification of sushi rice? _____ Sushi Rice pH must be < 4.2 [Most use pH ≤ 4.1]
22. Describe the method and frequency of pH monitoring including who does the monitoring.
23. Provide spec sheet for pH meter. **Accuracy of pH meter must be ±.01**
24. Describe calibration procedure for pH meter including the frequency (must be for done for each batch) [Calibration must include 2 buffers: 4 and 7].
25. Provide corrective actions policy including who is responsible. (What will be done if pH is >4.1?)
26. Provide laboratory certification that confirms process and recipe for required pH (must be within 1 year).

Temperature Monitoring (for storage, display, cooling, etc.)

27. Provide spec sheets for thermometers to be used in coolers and to take food temperatures.
28. Describe calibration procedure for thermometer(s) and frequency (daily).
 - a. Provide corrective actions policy including who is responsible.
 - b. Describe verification procedure - who will verify that approved process is followed, and logs are completed accurately and how often verification will be done.
 - c. What will be done if coolers are not holding product at ≤ 41°F.? If product is not cooled according to FDA Code?

Provide Monitoring Logs or One Log for All Items:

29. pH monitoring including calibration and corrective actions
30. Temperature monitoring of coolers and food including calibration and corrective actions
31. Verification of monitoring
32. Employee training log

Food Employee and Supervisory Training Plans, Policies (SOPs), and Practices

Provide Policies/SOPs for:

33. **Preventing contamination** (the policy must include wrapping bamboo mats with plastic before use, no bare hand contact with RTE food, and food prepared by an ill food worker or one who was diagnosed with an illness transmissible through food will be identified and destroyed.
34. **Sanitation practices** (cleaning/sanitizing)
35. **Employee health/hygiene policies/practices that meet DPH requirements.** Be sure to include the following with your policies:
 - a. *“Employees must report to the person in charge if they have symptoms of vomiting, diarrhea, jaundice, sore throat with fever, or lesion with pus on hands, wrists, or arms or if they have been diagnosed with a reportable disease or condition transmissible through food as listed in the current Connecticut list of Reportable Diseases, Emergency Illnesses, and Health Conditions.”* See the attached list of CT Reportable Diseases and a sample employee reporting form.
 - b. *“The person in charge shall notify the local health director of a food worker who is jaundiced or diagnosed with a disease or condition on the current Connecticut list of Reportable Diseases, Emergency Illnesses, and Health Conditions.* (Note: Food establishment owners/operators are required to report reportable diseases and conditions including

suspicion of a foodborne outbreak per section 19a-36-A3(3)(E) of the Regulations of Connecticut State Agencies.)

Note, a foodborne outbreak may be suspected if 2 or more similar complaints of illness are received.

c. *“Food workers who have jaundice, sore throat with fever, diarrhea, vomiting, or dizziness or have been diagnosed with a reportable disease or condition transmissible through food as listed in the current Connecticut list of Reportable Diseases, Emergency Illnesses, and Health Conditions shall be excluded from work and any food handled or prepared by them will be identified and destroyed. Time frames for excluding and returning to work shall be determined by the local director of health.”* Also note, suspicion of a foodborne outbreak is on the list and is reportable to the local director of health.

36. **Responding to consumer complaints of illness.** Include that if 2 or more related illnesses are reported and/or a foodborne outbreak is suspected, the local director of health will be notified.
37. **Procedure for training food workers.** Include a sample employee training log.
38. **State that the approved plan and accompanying documents/logs will be maintained onsite for at least 1 year and made available to inspector upon request.**
39. **State that plan will be reviewed at least annually and indicate who will review it.**
40. **State that no changes will be made to the plan unless approved in advance by the Connecticut Department of Public Health Food Protection Program**
41. **Include any other information relevant to the variance request.**
42. **Provide one document with all pages numbered. Include name of establishment and date of submission on front page of plan.**

**NOTE: This document is provided as guidance. Additional information may be required.*