

STATE OF COLORADO

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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

PROGRAM:	RETAIL FOOD
EFFECTIVE REGULATION:	<i>Colorado Retail Food Establishment Rules and Regulations, July 1, 2013</i>
INTERPRETIVE MEMO NO.:	14-07
DATE:	January 1, 2014
SUBJECT:	Ambient Temperature Holding of Sushi Rice Produced from Standardized Recipes

Retail food establishments that serve sushi typically store prepared sushi rice at ambient temperatures. Cooked rice is considered potentially hazardous and therefore must be time and temperature controlled for safety in accordance with Section 3-501 of the *Colorado Retail Food Establishment Rules and Regulations*.

Recipes for sushi rice commonly include vinegar, which may lower the pH to a level that renders the rice non-potentially hazardous. Since each recipe (and thus the pH) varies, a general determination of whether sushi rice is potentially hazardous cannot be made.

Evaluations of prepared sushi rice must be made on a case-by-case basis to determine if the rice may safely be held at ambient temperatures. If an operator proposes to store prepared sushi rice at ambient temperature, the operator must provide the regulatory authority with the following:

- 1) A standardized recipe used in the preparation of the sushi rice. A “standardized recipe” means that the batch size, ingredient list, amounts of each ingredient, and the mixing time remain the same for each batch.
- 2) Equilibrium pH test results from a qualified laboratory must be performed on at least one sample from three separate batches prepared using the standardized recipe (sample size shall be determined by the testing laboratory). In accordance with Section 1-202(83)(Table B) of the *Colorado Retail Food Establishment Rules and Regulations*, the equilibrium pH for each separate batch must be less than 4.2 in order to safely hold prepared sushi rice at ambient temperatures.

Sushi rice test results indicating a pH of 4.2 and above must be held under refrigeration or using time as a public health control, in accordance with section 3-605 of the *Colorado Retail Food Establishment Rules and Regulations*.

A copy of the standard recipe and equilibrium pH test results from a qualified laboratory must be maintained at the retail food establishment and made available to the regulatory authority upon request. Any deviation from the standardized recipe would negate the original test result and any approval issued by the regulatory authority.

Failure to follow the above provisions may result in the regulatory authority citing the violative condition and seeking corrective action such as denaturing and disposing of the mishandled product.

All previous interpretive memoranda issued pertaining to this subject are hereby superseded as of the effective date above.



Jeff Lawrence, Director
Division of Environmental Health and Sustainability