

**Conference for Food Protection  
2020 Issue Form**

**Issue: 2020 III-017**

**Council Recommendation:** Accepted as Submitted \_\_\_\_\_ Accepted as Amended \_\_\_\_\_ No Action \_\_\_\_\_

**Delegate Action:** Accepted \_\_\_\_\_ Rejected \_\_\_\_\_

*All information above the line is for conference use only.*

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**Issue History:**

This is a brand new Issue.

**Title:**

Create Committee – Standardization of HACCP Plans for Sushi at Retail

**Issue you would like the Conference to consider:**

The production of sushi at retail is considered a special process requiring a variance due to the acidification of rice to render it as a non-TCS food. In order to obtain this variance, a HACCP plan must be submitted and approved by the regulatory authority. The requirements of these HACCP plans vary widely between regulatory authorities, ranging from one CCP monitoring the pH of acidified rice to five or more CCPs in jurisdictions requiring that sushi kiosks be regulated under 21 CFR 123. These requirements are frequently not anchored in scientific references and are subject to the interpretation of risks by the regulatory authority. The wide variety of interpretations for what is required in a HACCP plan to safely produce sushi at retail highlights the need for a standardized, science-based HACCP plan to regulate sushi kiosks nationwide.

**Public Health Significance:**

The creation of a standardized, science-based HACCP plan for the production of sushi at retail would provide a variety of benefits for both retailers and regulators. The current process to obtain a variance requires a lengthy review process that may result in undue burden to the operator in the form of unnecessary critical control points not based in scientific fact. This can force for operators to maintain many versions of HACCP books for the same production process that must be updated on an annual basis or whenever individual regulatory authorities make changes. A standard plan would not only shorten plan review and approval times but would greatly reduce the number of HACCP plans that must be maintained. Currently, regulatory authorities must vary inspection criteria between operator and location. A standardized HACCP plan would allow for more consistent oversight and would allow for inspectors to be trained on established critical control points across all facilities. This benefit would also extend to operators who could be trained to follow a single plan that would control hazards across all jurisdictions.

**Recommended Solution: The Conference recommends...:**

*The Conference recommends...*

that a Committee for the Standardization of HACCP for Sushi at Retail be created. This committee shall be composed of industry, academic, and regulatory stakeholders and charged with the following:

- Determining best practices and collecting available guidance documents pertaining to the production of sushi prepared at retail stores.
- Identifying and quantifying the array of current regulatory requirements for HACCP plans pertaining to the production of sushi prepared at retail stores.
- Developing a science-based HACCP plan and guidance document for the production of sushi prepared at retail stores.
- Referencing the guidance document in the Food Code or Annex, or wherever the committee deems appropriate.
- Identifying the best methods to disseminate the committee's findings.
- Reporting the committee's findings at 2022 CFP Biennial Conference.

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