

Time As a Public Health Control - Information Bulletin

Time and temperature control bacterial growth in potentially hazardous (perishable) foods. Each must be controlled to ensure safe food products. Traditionally, temperature is primarily used to ensure food safety in commercial eateries. Under certain circumstances, however, it may be acceptable to remove perishable foods from temperature control for short periods of time (less than four hours) and rely on “time only” as the public health control. Used correctly, time can be an effective control because there is not enough time for bacterial growth or toxin production to cause foodborne illness. However, time must be closely monitored and controlled.

Which foods can be used with “time only” as the public health control?

- Ready-to-eat perishable food that is displayed or held for service and immediate consumption.

What criteria must be met before using “time only” as the public health control?

- The food establishment must complete a Time as a Public Health Control (TPHC) application form for each proposed food and submit it to Alberta Health Services (AHS) Environmental Public Health. This application can only be accepted from the original manufacturer of the food product, who must hold a valid Food Handling Permit issued by AHS.
- Detailed procedures provided on the application must include cooking and cooling processes, sanitizing procedures for food contact surfaces, food handling (preparation, serving and display), proposed time-labeling procedures, proposed records including the name of the food, the volume of food, the time the food was put out, and the time any food was discarded.
- The food container, package or food display must be clearly marked to indicate the exact time that is four hours past the point in time when the food is removed from temperature control. You may use digital timers, labels, marked color tags, or another means approved by your EHO (Health Inspector).
- Pre-packaged or pre-wrapped foods must be labeled indicating that “**these foods are intended for immediate consumption or refrigeration**”. Dispensed foods require a sign in the vicinity of the product indicating the same.
- All food in unmarked containers or on trays, or for which the four-hour time limit has expired, must be discarded.
- To ensure that employees know how to properly use time as a control, written procedures must be maintained in the food establishment which detail all of the following:
 - ⇒ which foods are allowed under these procedures
 - ⇒ marking food packages, containers or trays with a time limit
 - ⇒ discarding food that is unmarked or for which the time has expired
 - ⇒ properly handling foods approved for TPHC during preparation, storage and display.

These written procedures must be made available to the EHO (Health Inspector) upon request.

What happens next?

- Once the written application has been reviewed and accepted, a microbial assessment of the food product is required to confirm safe bacterial levels. Samples will be taken by AHS and submitted to a lab. Results of the analyses will be shared with you. Pathogenic bacteria modeling using the pH and water activity will determine the safety of the product for display up to four hours. Only those products that show little or no growth of pathogenic bacteria in a six-hour time period will be considered.
- If a food establishment wishes to extend the display time period at room temperature to greater than four hours then the proposed food product must be “challenge tested”. This will determine whether the product will support the rapid and progressive growth of pathogenic microorganisms when inoculated, and stored at ambient (room) temperatures for a time specified by the manufacturer. This testing must meet NSF/ANSI Standard 75 for Non-Potentially Hazardous Foods or an equivalent.
- Once approved, routine sampling will be conducted by AHS. Sampling will be conducted unannounced by the EHO at the point of sale and on a regular basis. Poor sample results may warrant more frequent testing or expulsion of the product from the program.
- If you wish to make any changes to the approved procedures, AHS Environmental Public Health **must be notified in advance** and **must approve these changes prior to implementation**.
- If a food establishment using TPHC fails to comply with the terms and conditions approved by AHS, the right to use TPHC may be revoked.

For more information, please contact your nearest Environmental Public Health office.

Edmonton Main Office
Calgary Main Office
Lethbridge Office

780-735-1800
403-943-2295
403-388-6689

Grande Prairie Main Office
Red Deer Main Office
www.albertahealthservices.ca/eph.asp

780-513-7517
403-356-6366

4EPHF-12-005
Created: Nov/04
Revised: Feb/12