

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. These procedures provide guidance to Public Health Inspectors to help assess if certain ready-to-eat **potentially hazardous food** can be displayed for immediate consumption and offered for sale at temperatures between 4°C and 60°C for up to four hours.

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 a public health control?

- The history of compliance of a food establishment will be considered. A facility with a poor inspection history may be denied approval until they can demonstrate an improved food safety culture.
- 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. Applications for province-wide approvals will be accepted from franchise head offices.
- Detailed procedures provided on the application must include cooking and cooling processes, 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 AHS Environmental Public Health.

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- Pre-packaged or pre-wrapped foods must be labeled indicating that “**these foods are intended for immediate consumption.**” 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 and why it’s important, written procedures must be maintained in the food establishment which detail all of the following:
 - ⇒ which foods are allowed under these procedures.
 - ⇒ marking of food packages, containers, or trays with a time limit
 - ⇒ discarding of food that is unmarked or for which the time has expired.
 - ⇒ properly handling of foods approved for TPHC during preparation, storage and display.

These written procedures shall **be provided as part of the application** and must be made available to the Health Inspector upon request. If a food establishment wishes to extend the display time at room temperature to greater than four hours, 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 be performed by an accredited laboratory following established processes such as the National Advisory Committee on Microbiological Criteria for Foods (NACMCF) Parameters for Determining Inoculated Pack/Challenge Study Protocols or equivalent. Challenge testing will be arranged by the applicant at the applicants’ expense.

Once approved, a letter outlining the procedure will be provided. 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.

Contact us at 1-833-476-4743 or [submit a request online](#) at ahs.ca/eph.

PUB-0965-202501

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