

**Conference for Food Protection
2014 Issue Form**

**Internal Number: 055
Issue: 2014 I-008**

Council Recommendation:	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
Delegate Action:	Accepted _____	Rejected _____	

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Title:

Amendments to Wild Harvested Mushroom language in Annex 3 Section 3-201.16.

Issue you would like the Conference to consider:

The language in Annex 3 Section 3-201.16 of the 2013 FDA Food Code should be revised to include additional and amended information about wild harvested mushrooms.

Public Health Significance:

Annex 3 Section 3-201.16 of the 2013 FDA Food Code provides additional information for regulatory jurisdictions to reference as they develop their own wild harvested mushroom program. The suggested revisions to this language assure that this Annex information is accurate and up-to-date.

Recommended Solution: The Conference recommends...:

that a letter be sent to FDA requesting that Annex 3 Section 3-201.16 of the 2013 FDA Food Code be amended as follows (new language is in underline format; language to be deleted is in strikethrough format):

3-201.16 Wild Mushrooms.

Over 10,000¹ ~~5000~~ species of fleshy mushrooms grow naturally in North America. The vast majority have never been tested for toxicity. It is known that about 15 species are deadly and another 60 are toxic to humans whether they are consumed raw or cooked. An additional 36 species are suspected of being poisonous, whether raw or cooked. At least 40 other species can be are poisonous if eaten raw, but are safe after proper cooking.

~~Some~~ While some wild mushrooms that are extremely poisonous may be difficult to distinguish from some edible species, there are many choice edible species that are distinctive to individuals with only modest training. In most parts of the country there is at least one organization that includes individuals who can provide assistance with both identification and program design. Governmental agencies, universities, and mycological societies are examples of such groups.

Regulatory authorities have expressed their difficulty in regulating wild harvested mushrooms at retail. There are many different approaches in regulating the sale and service of wild harvested mushrooms. The differences in approach could be due to geography, the type of wild mushrooms that typically grow in a particular region and/or local/state laws that are enforced. The Conference for Food Protection (CFP) has

attempted to develop a national model or standards for regulatory programs to address and recognize wild harvested mushroom identification. The difficulty in trying to get consensus on national model/standards lies in the question of what is the best national model/standard available that state/local regulatory authorities can apply in a meaningful way to ensure wild harvested mushrooms sold at retail are obtained from a safe source.

With the change in the codified text, the regulatory authority will have the flexibility to apply their laws and/or policies for wild harvested mushroom identification. At a minimum, when developing a wild harvest mushroom identification program, the following elements should be addressed:

- Developing resources & criteria to select wild mushroom species for service or sale,
- Establishing record-keeping and traceability to assure safety of wild harvested mushrooms,
- Written buyer specifications that include:
 - a. Identification by the scientific name and the common name of the mushroom species,
 - b. A statement that the mushroom was identified while in the fresh states,
 - c. The name and contact information of the person who identified the mushroom and the mushroom seller, and
 - d. A statement as to the qualifications and training of the identifier, specifically related to mushroom identification.

- Development of qualifications and training curriculum that could be used for further training of mushroom identifiers

- Establishing guidelines for chefs in preparing both wild and cultivated mushrooms. All mushrooms with the exception of truffles must be well cooked.²

In addition, the CFP has guidance material titled "Draft Model Guidance for Wild Harvested Mushrooms" posted on their website at www.foodprotect.org so state and local regulatory authorities can use the information to develop and implement their own wild harvested mushroom program. The guidance document is still a work in progress.

Refer also to the public health reason for §§ 3-101.11 and 3-201.11.

References:

¹ Biodiversity and Conservation, January 2007, Volume 16, Issue 1, pp 37-48

² Benjamin, Denis, R., Mushrooms Poisons and Panaceas: A Handbook for Naturalists, Mycologists, and Physicians, p146, W.H. Freeman & Company. 1995

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Attachments:

- a "Biodiversity and Conservation Article Abstract and Link"
- a "Mushrooms Poisons and Panaceas Article Reference"

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