

Conference for Food Protection – Committee FINAL Report

Template approved: 08/14/2013

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COMMITTEE NAME: Wild Harvested Mushroom

COUNCIL or EXECUTIVE BOARD ASSIGNMENT: Council I

DATE OF REPORT: December 6, 2013

SUBMITTED BY: Dave Martin and Lorinda Lhotka, Co-Chairs

COMMITTEE CHARGE(s):

Issue #: 2012 I-012

Charges: The Conference also recommends re-creating the Wild Harvest Mushroom Committee for the next biennium with the charge to continue to work to “refine guidelines to help regulators address the issue of wild mushrooms in food establishments”, as follows:

- 1) Work with FDA to revise current language in the FDA Food Code 3-201.16 and Annex 3 3-201.16 and create language that establishes criteria for compliance and enforcement;
- 2) *Refine educational curriculum and exam components, work with the USDA National Integrated Food Safety Initiative Retail Food Safety Consortium to develop a curriculum; Charge amended by the Executive Board May 14-15, 2013 to read: Create guidelines and learning objectives for jurisdictions to use to develop a local or regional Wild Harvested Mushroom training program;*
- 3) Pilot the draft model guidance;
- 4) Create a record keeping document for traceback purposes;
- 5) Report back to CFP at the 2014 biennial meeting.

COMMITTEE ACTIVITIES AND RECOMMENDATIONS:

1. Progress on Overall Committee Activities:
 - a. The Wild Harvested Mushroom Committee met via conference call 13 times between October 23, 2012 and December 2, 2013. The committee was small in number but the members were committed to the process and attendance was consistent. The committee included both new members and returning members from the 2010-2012 CFP Wild Harvested Mushroom Committee. The returning members provided invaluable experience and insight on the prior process.
 - b. Outcome of committee charges:
 - i. Work with FDA to revise current language in the FDA Food Code 3-201.16 and Annex 3 3-201.16 and create language that establishes criteria for compliance and enforcement. Status—charge completed.
 - 1) In December 2012, the committee took advantage of an opportunity to submit code language to CFSAN to recommend a change in the wild mushroom language which would be reflected in the 2013 FDA Food Code.

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- 2) The 2009 FDA Food Code language (3-201.16) requires each mushroom be individually inspected by an approved mushroom expert. The committee submitted language that was based upon the standard in Oregon. Oregon language builds on recommendations from other sources and provides for three things: Consumer notification, information about the mushroom seller and identifier; and a statement of the qualifications of the identifier and retention of this information;
 - 3) A conference call was held with CFSAN on January 28, 2013 to discuss the submittal. CFSAN appreciated the effort, but was not comfortable accepting the amended language as proposed.
 - 4) CFSAN did agree to change the 2013 FDA Food Code language to remove the requirement that each mushroom be individually inspected by a mushroom expert and instead defer to the regulatory authority to determine compliance with 3-201.16.
 - 5) The committee agreed to address CFSAN's concerns and submit updated model code language as part of the final report of the committee in December 2013.
 - 6) The committee revised the language to address CFSAN's concerns with a recommendation that it be considered for inclusion in the next version of the FDA Food Code either as suggested code language in italics or added to Annex 3 as an option for compliance with 3-201.16.
- ii. Create guidelines and learning objectives for jurisdictions to use to develop a local or regional Wild Harvested Mushroom training program. Status—charge amended; alternate charge completed.
- 1) The committee is charged with refining the education curriculum and exam components developed by the previous committee and to work with USDA to develop curriculum.
 - 2) At the February 20, 2013 conference call, the committee invited Dr. Brian Nummer, Extension Specialist from Utah State University and Turan Ayvaz from the Certificate Accreditation Program at the American National Standards Institute (ANSI) to provide background information on the development of a curriculum and exam as part of a certificate or certification program.
 - 3) Dr. Nummer and Mr. Ayvaz indicated that the cost of developing a curriculum and exam as part of a certificate or certification program is quite expensive (\$10K to \$100K). As a result, the committee agreed that it would be impractical for this committee to develop a curriculum and exam and that the best way to move the committee charges forward was to instead develop guidelines and learning objectives for jurisdictions to use to create their own local or regional training program.
 - 4) The committee agreed to ask the CFP Council Chairs and Executive Board to approve an amendment to this committee charge to reflect this recommendation, which was approved at the May 14-15, 2013 Executive Board meeting.
 - 5) The committee researched existing training programs and compared those with the learning objectives developed by the previous CFP Wild Mushroom Committee. The committee then finalized a recommended set of learning objectives that can serve as a model for other

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- jurisdictions to use as they develop their own local or regional training programs.
- 6) The committee will request that the learning objectives be included in Annex 3 of the next edition of the FDA Food Code.
- iii. Pilot the draft model guidance. Status—charge incomplete.
 - 1) The initial charge of the Wild Harvested Mushroom Committee was to refine educational curriculum and exam components developed by the previous 2010-12 committee and work with the USDA National Integrated Food Safety Initiative Retail Food Safety Consortium to develop a curriculum.
 - 2) The Wild Harvested Mushroom Committee requested an amendment to the charge after consulting with ANSI because of the cost of developing such a program and the impracticality of this committee being able to accomplish this task.
 - 3) Instead, the committee agreed to develop guidelines and learning objectives for jurisdictions to use to develop a local or regional training program.
 - 4) As a result, this charge is premature since these objectives would be used by a regulatory jurisdiction to develop their training program and piloting the program would follow that step.
 - iv. Create a record keeping document for traceback purposes. Status—charge completed.
 - 1) To effectively develop a record keeping document for traceback purposes, it is critical to know the location where the mushroom was harvested. Harvesting areas are coveted and there is a competitive advantage to keeping harvesting location information secret, so pickers are reluctant to disclose their harvest locations. This makes it difficult to develop a standard tracking form when it may not be possible to determine the harvest location.
 - 2) The 2013 FDA Food Code Annex 3 does include recommendations relating to written buyer specifications for regulatory programs to use when developing their own programs. It also recommends that jurisdictions address record-keeping and traceability to assure safety of wild harvested mushrooms. Therefore, the committee recommends that jurisdictions develop their own record keeping document using information in Annex 3 and taking into consideration factors unique to each local or regional jurisdiction, including accounting for appropriate records retention.
2. Recommendations for consideration by Council:

With the change to the 2013 FDA Food Code language, the availability of existing CFP developed guidance documents and the recommendations from the current Committee, jurisdictions now have the resource information and flexibility necessary to develop their own program if they choose to do so. The Wild Harvested Mushroom Committee seeks acknowledgement of the submitted Committee report, resulting Issues and that the Committee be disbanded.

CFP ISSUES TO BE SUBMITTED BY COMMITTEE:

Issue 1. Report – Wild Harvested Mushroom Committee Final Report.

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~~The Wild Harvested Mushroom Committee seeks Council I's acknowledgment of the committee's final report.~~

Issue 2. Model Wild Harvested Mushroom Food Code Language for Annex 3 Section 3-201.16.

~~Model regulatory language should be added to Annex 3 Section 3-201.16 of the next edition of the FDA Food Code to provide a template for regulatory jurisdictions to use as they choose to develop their own wild harvested mushroom standards.~~

Issue 3. Wild Harvested Mushroom Identifier Course Learning Objectives.

~~Model learning objectives should be added to Annex 3 Section 3-201.16 of the 2013 FDA Food Code to provide a template for regulatory jurisdictions to use if they choose to develop their own wild harvested mushroom identifier training or certification program.~~

COMMITTEE MEMBER ROSTER (attached):

4. Wild Harvested Mushroom Committee Final Roster.