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POSITION STATEMENT: Wild Foraged Mushrooms in North Carolina Food Establishments

PURSUANT TO: North Carolina Food Code Manual, Section 3-201.16

SOURCE: Cindy Callahan, REHS
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QUESTION/ISSUE: What criteria must be met to be an approved mushroom identification expert?
What species of wild mushrooms are considered approved if foraged by a mushroom identification expert?

Discussion/Rationale:

The North Carolina Food Code Manual Section 3-201.16 states:

“(A) Except as specified in ¶ (B) of this section, mushroom species picked in the wild shall be obtained from sources where each mushroom is individually inspected and found to be safe by an APPROVED mushroom identification expert. ^P

(B) *This section does not apply to:*

- (1) *Cultivated wild mushroom species that are grown, harvested, and processed in an operation that is regulated by the FOOD regulatory agency that has jurisdiction over the operation; or*
- (2) *Wild mushroom species if they are in packaged form and are the product of a FOOD PROCESSING PLANT that is regulated by the FOOD regulatory agency that has jurisdiction over the plant.*”

“Approved” means acceptable to the regulatory authority based on a determination of conformity with principles, practices, and generally recognized standards that protect public health.

It is not clear in Paragraph 3-201.16(A) of the North Carolina Food Code Manual (Code) or the Food Code Annexes the way the regulatory authority should determine what constitutes an “approved mushroom identification expert” or how to enforce the Code provisions associated with this requirement. Further, there have been instances where food establishments are purchasing and serving wild foraged mushrooms without regulatory oversight.

The 2009 Food Code Annexes provides recommendations for written buyer specifications based on the Conference for Food Protections (CFP) recommendations. Subsequently, a CFP committee developed a guidance document, “Guidance Document for a Model Wild-Harvested Mushroom Program,” which is available to regulatory authorities.

Response/Interpretation

To address regulatory authority and stakeholder concerns, the Wild Mushroom Committee was formed in 2016. The Committee's charge was to establish requirements that would allow wild mushroom foragers to sell to food establishments using the criteria set forth in the CFP "Guidance Document for a Model Wild-harvested Mushroom Program."

Paragraph 3-210.16(A) of the Code does not specify requirements for an "approved mushroom identification expert." Therefore, the CFP guidance document was used to determine the criteria that must be met for a wild mushroom forager to be an "approved mushroom identification expert". The criteria include record keeping and traceability, and written buyer specifications.

It is the responsibility of the wild mushroom forager and the food establishment to provide and maintain documented proof that the forager is an "approved mushroom identification expert" in accordance with CFP guidance document criteria. Documented proof provided by the forager includes a written statement as to their qualifications and successful completion of training specifically related to wild mushrooms. Further, the documented proof must include information about illness, identification, harvesting, best handling practices, and regulatory requirements. The food establishment is also responsible for providing this information to the regulatory authority.

Although certification is not required by Code, it may be difficult to comply with all the CFP guidance document criteria without completing a certification course. To assist the regulatory authority in determining if qualifications and training are adequate to deem a forager to be an "approved mushroom identification expert," the forager may provide a signed and dated letter or certificate issued by the accrediting person or organization certifying that the forager has successfully completed wild mushroom identification training. The letter and/or certificate must specify the species of wild mushroom(s) the forager is qualified to identify.

Two documents were developed to assist the regulatory authority. The "North Carolina Wild Mushroom Verification Form" must be completed and signed by the wild mushroom forager and the person in charge (PIC) of the permitted food establishment. This form must be maintained in the food establishment for at least 90 days from the date of sale. The form includes identification of the mushroom species by the scientific and common name, the name, address and telephone number of the wild mushroom forager and the food establishment, and a statement describing the qualifications and training of the wild mushroom forager. The statement must specify the species of wild mushroom(s) the forager is qualified to identify.

The "North Carolina Wild Mushroom Verification/Sale Tag" should remain attached to the container in which the wild harvested mushrooms are received. It must remain attached until the container is empty. The tag shall be retained for 30 days and shall include the name and address of the wild mushroom forager, forage location, date foraged, date delivered to the food establishment, and the date the container is empty. The species of mushrooms and the quantity by weight must be marked on the tag. The sixteen-species listed below are the only wild mushrooms approved to be foraged and sold to food establishments in North Carolina. The mushroom species are also listed on the tag.

- **Beefsteak (*Fistulina hepatica*)**
- **Black Trumpet (*Craterellus fallax*)**
- **Cauliflower (*Sparassis crispa*, *S. herbstii*, *S. spathulata*)**
- **Chanterelles (*Cantharellus cibarius*, *C. lateritius*, *C. cinnabarinus*, *C. appalachiensis*)**
- **Chicken of the Wood (*Laetiporus sulphureus*, *L. cincinnatus*, *L. perscinus*)**
- **Comb Tooth (*Hericium ramosum*)**
- **Hedgehog (*Hydnum repandum*)**
- **Honey (*Armillaria ostoyae*, *A. mellea*)**
- **Indigo Milk Cap (*Lactarius indigo*)**
- **Leatherback (*Lactarius corrugis*, *L. volemus*)**
- **Lions Mane (*Hericium erinaceus*)**
- **Lobster (*Hypomyces lactifluorum*)**
- **Maitake (*Grifola frondosa*)**
- **Morel (*Morchella esculenta*, *M. deliciosa*, *M. elata*)**
- **Oyster Mushroom (*Pleurotus ostreatus*)**
- **Puffballs (*Lycoperdon*, *Calvatia*)**

The “North Carolina Wild Mushroom Verification Form” (attached) can be accessed on the Forms Page of the Environmental Health Section’s Website. The “North Carolina Wild Mushroom Verification/Sale Tags” can be ordered on the Annual Print Order.

Wild foraged mushrooms that do not have the “North Carolina Wild Mushroom Verification/Sale Tag” attached to the container and the “North Carolina Wild Mushroom Verification Form” in the food establishment, are considered food from an unapproved source. It is a violation of Code Section 3-201.16(A) and should be marked as a violation of #9 on the Food Establishment Inspection Report. In addition, the mushrooms are subject to voluntary disposal or embargo.

Please contact your Regional Specialist if you have questions.

References:

Rules Governing the Food Protection and Sanitation of Food Establishments, 15A NCAC 18A .2600
North Carolina Food Code Manual
2009, 2013 FDA Model Food Code Annexes
[CFP Model Wild-Harvested Mushroom Program.](#)

NOTE: Position statements are policy documents to clarify how to interpret or enforce a law or rule. They are not enforceable on their own, but are intended to promote uniform interpretation and enforcement of the underlying law or rule.