

# SHELL EGG LABELING GUIDE

Vermont Agency of Agriculture, Food, & Markets

Food Safety & Consumer Protection Division

Farm fresh eggs are a versatile food, excellent source of nutrition, and popular way for consumers to support local farms.

This guide provides an overview of Vermont and federal egg labeling requirements to assist egg producers with correctly labeling their products. The guide is not meant to be fully comprehensive, and readers should refer to the applicable laws and regulations for further details.

Unless otherwise noted, the mandatory requirements in this guide primarily apply to in-shell chicken eggs. Producers of non-chicken eggs (such as duck or quail eggs) may choose to follow these guidelines where applicable.

## TERMS

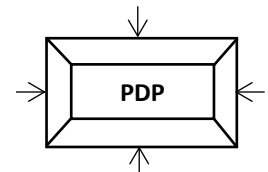
### Principle Display Panel (PDP)

- The part of the label most likely to be seen by the consumer at point of sale.
- The PDP is typically the top panel of an egg carton as show in Figure 1.

### Information Display Panel

- The Information Display Panel is the panel immediately to the right of the PDP, or when the top of the package is the PDP, it is any panel adjacent to the PDP.

Figure 1: Egg Carton Panels



Information Panels

## MANDATORY REQUIREMENTS

### Licensing and Registration

- Egg producers and egg retailers do not require a license or registration to operate in Vermont.
- Egg producers with 3,000 or more laying hens must register with the FDA and comply with 21 CFR part 118 (the “Egg Safety Final Rule”): <https://www.fda.gov/food/eggs-guidance-documents-regulatory-information/egg-safety-final-rule>.

### Statement of Identity “EGGS” (FDA, 21 CFR § 101.3)

- The statement of identity “EGGS” must appear on the PDP.
- “EGGS” must be in bold print and be at least ½ the type size of the largest print on the PDP.
- “EGGS” must be parallel to the base of the container or the label.

### Declaration of Net Quantity of Content (FDA, 21 CFR § 101.7)

- The net content must be listed on the bottom 30% of the PDP.
- Net content must be stated as: 6 Eggs or Half Dozen Eggs, 12 Eggs or One Dozen Eggs, etc.

### Grade and Size (VT, 6 VSA § 354)

- Each container must be plainly and conspicuously marked with the proper grade and size.
- The label may only include one official grade term and one official size term.
- Official grades are Grade AA, Grade A, and Grade B.
- “Ungraded” or “nest run” are not official grade terms for eggs sold at retail.
- Refer to the Vermont Fresh Egg Regulations for grade quality specifications and tolerances: <https://agriculture.vermont.gov/food-safety/fruits-vegetables-and-eggs>.

- Official egg sizes:

	Jumbo	Extra Large	Large	Medium	Small	Pewee
Weight per dozen	30 oz.	27 oz.	24 oz.	21 oz.	18 oz.	15 oz.
Weight individual	29 oz.	26 oz.	23 oz.	20 oz.	17 oz.	----

**Statement of Responsibility (FDA, 21 CFR § 101.5)**

- The legal name, business address, and zip code of the producer or distributor must be on the PDP or Information Panel.
- The statement of responsibility must be accurate and truthful. Use “produced by” or similar wording if the business is the producer. Use “distributed by” or similar wording if the business acts as a reseller of another producer’s eggs.
- The street address may be omitted if the location is listed in a local directory.
- A business phone number is encouraged but not required.
- Minimum text size is 1/16”.

**Safe Handling Instructions (FDA, 21 CFR § 101.17(h))**

- Safe Handling Instructions must be listed on the PDP, Information Panel, or the inside lid.
- Minimum text size is 1/16”.
- Safe Handling Instructions must include the exact statement below:

**SAFE HANDLING INSTRUCTIONS:** To prevent illness from bacteria: keep eggs refrigerated, cook eggs until yolks are firm, and cook foods containing eggs thoroughly.

**Nutrition Facts Panels (FDA, 21 CFR § 101.9(d) and § 101.9(j))**

- Nutrition labeling is enforced by the FDA. Retailers with less than \$500,000 in annual sales are exempt. Refer to FDA guidance: <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/small-business-nutrition-labeling-exemption-guidance>.
- For egg nutrition information and formatting: <https://www.incredibleegg.org/nutrition/egg-nutrition-facts>.

**Cartons (VT, 6 VSA § 354(a))**

- Blank cartons: The producer/distributor is responsible for including all labeling requirements.
- Pre-printed cartons: Often come with many labeling requirements included (e.g., statement of identity, net quantity, safe handling instructions, and nutrition labeling).
- Reused cartons: May be used but must be structurally sound and clean; previous marking that are no longer accurate must be removed, covered, or crossed out to prevent misbranding.

**Vermont or Locally Produced (VT, 9 VSA § 2465a)**

- Eggs may be labeled as “local” or “Vermont eggs” only if they are harvested in Vermont from hens raised for at least one third of their life in Vermont.

**OPTIONAL REQUIREMENTS**

**National Organic Program (NOP) (USDA, 7 CFR § 205)**

- To use the NOP logo, the operation must be NOP certified by an accredited certifying agent.

### **USDA Grademark and Approval Number**

- Only products that meets the criteria established by USDA are allowed to bear a USDA grademark and must include a USDA-assigned approval number.
- Refer to USDA regulations and policies regarding use of grademarks: <https://www.ams.usda.gov/grades-standards/egg/grade-shields>.

### **Net Weight (FDA, 21 CFR § 101.105(g))**

- If net weight is listed, it must be in this format: 24 oz. (1 lb. 8 oz.) 681 g.
- The space around the net weight claim must be free of print or graphics equal to the height of the net weight type size.

### **Sell By / Best By / Use By date (USDA, Shell Egg Grading Manual)**

- The date can be up to 30 days from the packing date when using the following terms: EXP, Expiration date, Sell By, Not to be sold after, Purchase By, or other words of similar meaning.
- The date can be up to 45 days from the packing date when using the following terms: Use Before, Use By, Best Before, Best By, Best if Used By, or other words of similar meaning.

### **Color**

- The color of the eggs is optional and not required on the label.

### **Keep Refrigerated Statement**

- If used, the label should state “Keep refrigerated at 45 F or less.”

## RESOURCES

- Vermont Egg Law and Regulations: <https://agriculture.vermont.gov/food-safety/fruits-vegetables-and-eggs>
- USDA Shell Egg Labeling Guide: <https://www.ams.usda.gov/grades-standards/shell-egg-labeling-guidance>
- USDA Egg Grading Manual: <https://www.ams.usda.gov/grades-standards/egg-grading-manual>
- FDA Egg Safety Final Rule: <https://www.fda.gov/food/eggs-guidance-documents-regulatory-information/egg-safety-final-rule>
- American Egg Board, Egg Nutrition Facts: <https://www.incredibleegg.org/nutrition/egg-nutrition-facts>

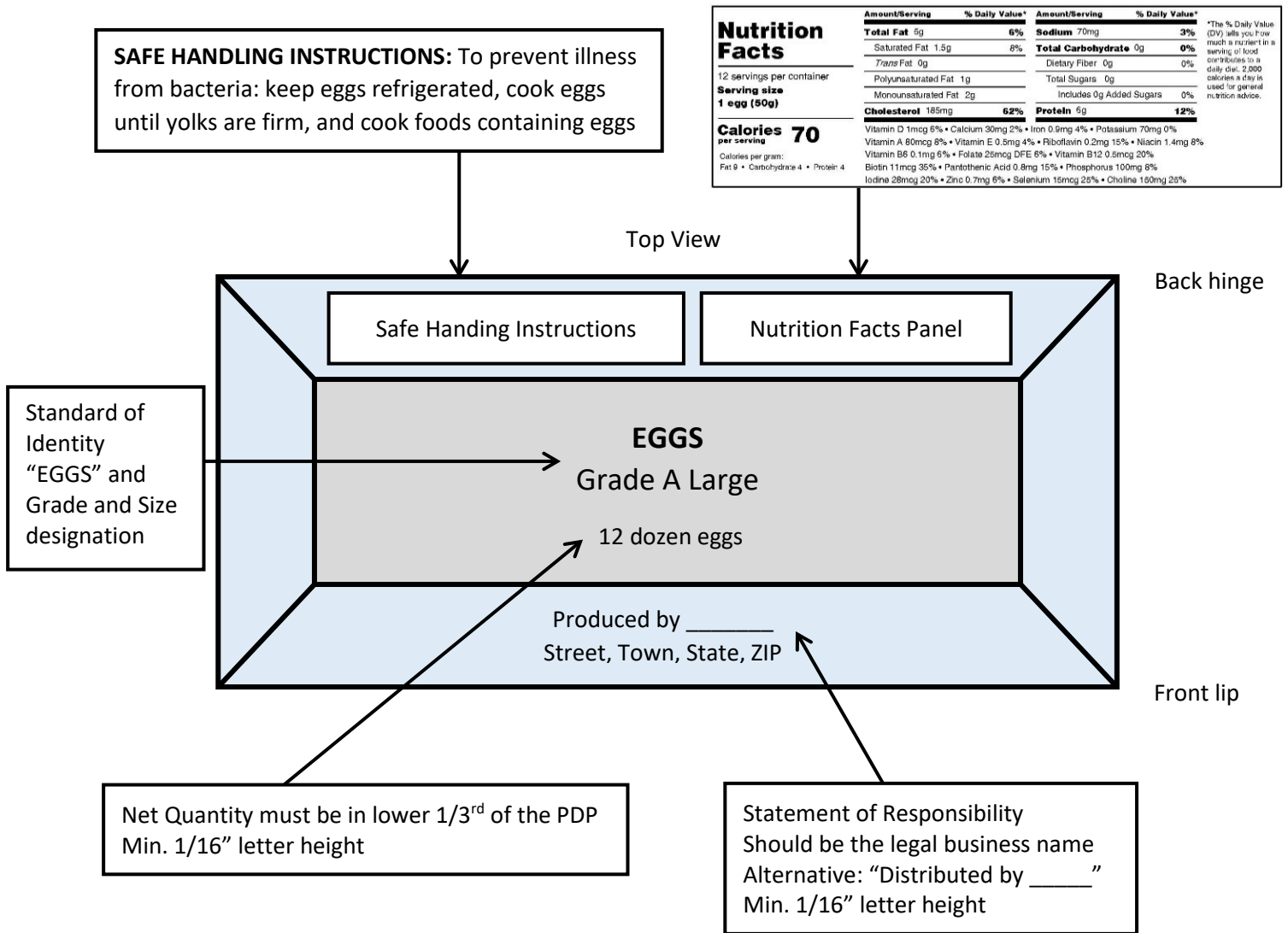
## QUESTIONS

- Contact the Agency of Agriculture, Food, & Markets’ Food Safety & Consumer Protection Division at 116 State St., Montpelier, VT 05620, or call (802) 828-2433.

## EXAMPLE LABEL – MANDATORY REQUIREMENTS ONLY

The top view of a one-dozen egg carton showing mandatory label requirements.

Note: This example depicts one label design among many that may be acceptable. Refer to the mandatory requirements for specifications about letter size and location as applicable.



## EXAMPLE LABEL – MANDATORY & OPTIONAL REQUIREMENTS

The top view of a one-dozen egg carton showing mandatory labeling requirements (in black) and optional requirements (in red).

Note: This example depicts one label design among many that may be acceptable. Refer to the mandatory requirements for specifications about letter size and location as applicable.

