



To: All QAD personnel providing shell egg grading services

From: Jeff Hendricks
National Shell Egg Supervisor

Subject: Amendments to QAD 709

The following amendments to QAD 709 are being issued as a superseding policy memo until such time as the amendments can be incorporated into the full QAD 700 Shell Egg Graders Procedures document.

The changes reflect an effort to reduce frequent instances of contact with live birds by accepting third party certifications for ongoing verification of specialty housing systems. This change should mitigate biosecurity risks to stakeholders, while maintaining a robust marketing claims verification program for USDA shielded products.

709.14 Animal Husbandry Verification Procedures is amended as follows:

To ensure the integrity and accuracy of animal care marketing claims on labels bearing USDA grademarks, AMS must verify animal husbandry practices for all layer flocks prior to processing, and on a continuous basis during processing by monitoring the effectiveness of the approved segregation plan. This section will serve as guidance on how to accomplish these verifications.

709.14a Definitions

USDA – AMS develops definitions and standards for the quality of shell eggs. Since animal husbandry is not a product quality consideration, The definitions listed are adopted from a comprehensive industry effort to define cage-free and free-range that are widely accepted.

Cage Free

Eggs packed in USDA grademarked packages labeled as cage free are laid by hens that are able to roam vertically and horizontally in indoor houses, and have access to fresh food and water. Cage-free systems vary from farm-to-farm, and include multi-tier aviaries. They must allow hens to exhibit natural behaviors and include enrichments such as scratch areas, perches and nests. Hens must have access to litter, protection from predators and be able to move in a barn in a manner that promotes bird welfare.

Free Range

Eggs packed in USDA grademarked packages labeled as free range must be produced by hens that are able to roam vertically and horizontally in indoor houses, and have access to fresh food and water, and continuous access to outdoors during their laying cycle. The outdoor area may be fenced and/or covered with netting-like material. Housing systems vary from farm-to-farm, and can include multi-tier aviaries. They must allow hens to exhibit natural behaviors and include

enrichments such as scratch areas, perches and nests. Hens must have access to litter, protection from predators, and be able to move in the barn in a manner that promotes bird welfare.

Pastured / Pasture Raised

Due to a lack of a single definition for pasture raised laying hens, eggs packed in USDA grademarked packages labeled as pastured or pasture raised must be currently certified by a nationally recognized certifying body such as American Humane or Certified Humane.

709.14b Equivalencies

For the purposes of AMS certification of grademarked products, eggs with certain types of housing certification inherently meet or exceed requirements for other types of marketing claims and may be packaged into those cartons.

All types of eggs with specialty certification may be packaged into cartons that do not bear a specialty marketing claim. For example, organic eggs may be packaged into cartons that do not state Organic on the label, but the reverse is not acceptable.

- **Cage Free** certified product may only be packed into cage free cartons or cartons that do not bear an animal husbandry claim
- **Free Range** certified product may also be packaged into cage free cartons, but not into organic or pasture raised cartons without additional certification.
- **Pastured** or **Pasture Raised** certified product may also be packaged into free range, cage free, or cartons that do not bear an animal husbandry claim, but not into organic cartons without additional certification.
- **Organic** certified product inherently meets the requirements of Cage Free or Free Range product and may be packed into either, but not into pasture raised cartons without additional certification.

709.14c Initial Onsite Visits

When plant management indicates that a new or existing layer house designated as either Cage Free or Free Range is to begin packing into USDA graded product, and that layer house has never been verified by USDA-AMS personnel before, the initial verification must be conducted and documented by AMS.

When there are active avian disease events, the Grading Services Branch Chief or their designee may consult with the National Shell Egg Supervisor to determine whether alternative verification methods may be prudent. These methods must always include a visual verification component, such as live streaming video of the interior of the house taken by a company employee in lieu of

an in-person visit. If an alternative method is used for the initial visit, an additional initial verification must be scheduled when the avian disease event subsides.

709.14d Frequency of Continued Verification

Once a layer house has been verified by USDA-AMS personnel, the house must then be verified on an annual basis to remain eligible for specialty marketing claims on USDA Gradedemarked packages. USDA will accept verification documentation from recognized national certifying bodies such as USDA's National Organic Program (NOP); American Humane Certified; Certified Humane; or United Egg Producers (UEP). Certification documents must be provided to the grader on site showing successful completion of these audits and must be maintained on an annual basis in the grader's filing system. It is preferable for the document to specify which flocks are compliant with the program, however some certifying agencies will only issue documentation on a company-wide basis.

Note that certificates from the National Organic Program are typically issued until revoked, and thus may not reflect a current date. If management provides a NOP certificate that shows a date more than a year in the past, they must also provide evidence that the certificate is still in good standing.

If preferred by plant management, and upon request, annual verification visits may still be performed by USDA-AMS staff.

709.14e Verification Reports

When completing the Cage Free Layer House Verification Report, record the general size and identity of the layer flock(s), whether the hens have continuous access to an acceptable outdoor area to roam, and whether the layer house design provides perches, scratch or dust bathing areas, etc. that may be requested as additional marketing claims. The form shall be signed and dated.

If requested by management, a form LP-210S may be issued certifying either cage free or free range verification conducted by USDA-AMS. See exhibit V for an example of this type of certification.

709.14f Unsatisfactory Verifications

When the results of an initial USDA-AMS verification visit are unsatisfactory, nonconforming items will be noted on the Cage Free Layer House Verification Report. The report must be discussed with plant management and filed separately from conforming reports. Source flocks identified in nonconforming reports are not eligible to be packed into grademarked cartons with cage free and/or free range marketing claims.

If plant management is unable to provide third-party verification documentation for existing source flocks when verification is due, USDA-AMS must verify that source flock in order to maintain the flock's eligibility for cage free or free range marketing claims.

709.14g Segregation Plans


The verification procedure will also require a written plan to maintain the segregation and identity of the eggs for a certified source flock(s) from the time of production through storage, transport, processing, and packaging that is deemed acceptable by the grading supervisor. This written plan must be provided to the scheduled grader assigned to the identified egg packing plant and filed.

The grader is required to monitor the effectiveness of the segregation plan during their normal duties. Any evidence that the segregation plan is not effective should be brought to the attention of plant management and the AMS supervisor for remedy. Specialty eggs that have been comingled with product not meeting the specialty characteristics are no longer eligible to be packed into grademarked cartons bearing such specialty claims.

Exhibit V

(See reverse side of form for OMB and EEO Statement)

OMB APPROVED: NO. 0581-0128

 U.S. DEPARTMENT OF AGRICULTURE AGRICULTURAL MARKETING SERVICE Livestock and Poultry Program	SHELL EGG GRADING CERTIFICATE	This certificate is receivable in all courts of the United States as prima facie evidence of the truth of the statements therein contained. This certificate does not excuse failure to comply with any of the laws and regulations enforced by the United States Department of Agriculture.	CERTIFICATE NO. SEA- 1234567
			PLACE EXAMINED City, State
			PLANT NUMBER NA

APPLICANT (Name and address, including ZIP)	NAME AND ADDRESS OF SHIPPER OR SELLER 1/	NAME AND ADDRESS OF RECEIVER OR BUYER 1/
Applicant Name Address City, State, Zip Code	Not Applicable	Not Applicable

LOT NO.	NO. CONTAINERS PER LOT 1/	NO. CONTAINERS EXAMINED	NET WT. 2/	PERCENTAGES								OFFICIAL U.S. GRADE AND SIZE
				AA	A	B	B*	Dirty	Checks	Loss	Under Wt. 3/	
See	Remarks	---	---	---	---	---	---	---	---	---	---	---

DESCRIPTION							
LOT NO.	EGGS	TYPE OF PACKING	TYPE OF PACKAGING	CASE QUALITY RANGE	CHARACTER OF LOSS	WHERE HELD AND TEMPERATURE	CASES STAMPED WITH

ADDITIONAL CERTIFICATION			
Product represented by this certificate meets specification requirements for:			
_____ Dated _____			
PURCHASE ORDER #	SALES ORDER #	ITEM #	<input type="checkbox"/> Product represented on this certificate meets the requirements for the stated grade and size as determined by online sampling on _____
			<input type="checkbox"/> Disease Free Certification Statements attached.

REMARKS:

Cage Free Verification was performed by [USDA Employee] on mm/dd/yyyy

House 1 - 150,000 layers

House 2 - 120,000 layers

House 3 - 130,000 layers

Houses listed above meet the definition for [cage free or free range] as stated in QAD 709 procedures.

Eggs originating from these houses are eligible to be certified as USDA [cage free or free range].

CERTIFICATION STATEMENT		
In compliance with the Regulations of the Secretary of Agriculture Governing the Grading of Shell Eggs issued pursuant to the Agricultural Marketing Act of 1946, as amended, and any other Act of Congress conferring like authority, it is certified that the product(s) listed hereon were examined and that the class, quality, quantity, and/or condition of the product(s) at the time and on the date shown, were as stated above.		
Typed name of USDA Grader	Grader's signature (in blue ink)	MM/DD/YYYY
OFFICIAL GRADER (Printed Name & Signature)		DATE
1/ As stated by applicant or contractor. 2/ Weights based on 30-dozen equivalent. 3/ Eggs reported as undersized are also reported under other headings according to their quality.		
LP-210S (02/2025) (Previous LP-210S editions may be used.)		