Frostings and Icings

Why are butter-based buttercream frostings, royal icing with meringue powder, and icings made with perishable ingredients not allowed as cottage food products?

Butter-based buttercream frostings, royal icing, and icings made with perishable ingredients (e.g., milk, butter, reconstituted meringue powder, etc.) produce a final product with a variable water activity depending upon the recipe. If the water activity or available water in the product is above 0.85, the icing is perishable and capable of supporting bacterial growth that could make someone ill if the product is not maintained under refrigeration. This is why icings with perishable ingredients cannot be offered as a cottage food unless the product is tested by a certified food laboratory, and the recipe produces a final product that is non-potentially hazardous with a water activity of 0.85 or below.

You may have your recipe tested by a certified food laboratory to determine if the final water activity of the product is 0.85 or below, which would make it allowable under cottage foods. Without laboratory documentation that the frosting/icing has a water activity below 0.85, icings with perishable ingredients such as buttercream or royal icing cannot be sold as a cottage food product. Reminder: if your recipe or ingredients change, you would need to get your icing re-tested if any ingredients are perishable/potentially hazardous.

Royal Icing Note: Royal icing is typically made from egg whites. Egg whites from unpasteurized shell eggs cannot be used in cottage foods since the product is an icing that will not be heat treated to kill the pathogen of concern, salmonella, which could make someone ill when they consume it. Bakers often use meringue powder because the meringue powder contains egg whites that have been pasteurized or heat treated to kill salmonella. When water is added to reconstitute the meringue powder it becomes a perishable or potentially hazardous food.

Frostings and icings made with oils (shortening, lard, etc.) and other non-potentially hazardous ingredients, and commercially prepared icings that do not require refrigeration (i.e. are not labeled either "keep refrigerated" or "refrigerate after opening") are allowed as cottage food products.