



Human Foods Program

September 25, 2025

Dale Crawford
Steel Tube Institute
130 East Randolph, Suite 2000
Chicago, IL 60601
dcrawford@steeltubeinstitute.org

RE: Pre-notification Consultation (PNC) 003310

Dear Mr. Crawford:

This letter is in response to emails dated July 24, 2025, and September 12, 2025, submitted on behalf of Steel Tube Institute, requesting an opinion on the use of stainless steel electrical conduit in food processing facilities, where the electrical conduit runs in proximity to food being processed and may incidentally contact food. Your request was reviewed as PNC 3310.

The stainless steel conduit is American Iron and Steel Institute (AISI) grades 304 and 316. You provide a description of composition of the stainless steel, its corrosion and abrasion resistance, resistance to chemical degradation in acidic, alkaline, moist and chloride environments, smoothness and cleanability, and compliance with industry standards.

Given the properties of the stainless steel and its intended use you have described, the stainless steel and its constituents would not be expected to become a component of food at any significant level. FDA has historically issued favorable opinions on the use of AISI 304 and 316 stainless steels in contact with food, and we are currently not aware of any known or likely safety questions associated with the described intended use. Therefore, FDA has no objection to the use of the stainless steels you have described and premarket approval of the stainless steels as food additives under section 409 of the Federal Food, Drug and Cosmetic Act (FD&C Act) is not required (*i.e.*, the submission of a food contact substance notification, a food additive petition or a threshold of regulation exemption request is not required).

We note that materials that contact food are subject to the provisions of the FD&C Act and with Title 21 of the Code of Federal Regulations (21 CFR) §174.5 – General provisions applicable to indirect food additives, including that the materials are of suitable purity and do not impart odor or taste to food rendering it unfit for human consumption.

Sincerely,

U.S. Food and Drug Administration
Human Foods Program
5001 Campus Drive
College Park, MD 20740
www.fda.gov

Kenneth McAdams
Consumer Safety Officer
Division of Food Contact Substances
Office of Pre-Market Additive Safety
Office of Food Chemical Safety, Dietary Supplements, and
Innovation
Human Foods Program