



DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Silver Spring, MD 20993

SEP 27 2013

The Honorable Scott DesJarlais, M.D.
House of Representatives
Washington, D.C. 20515

Dear Dr. DesJarlais:

Thank you for your letter of July 24, 2013, regarding provisions of the Food and Drug Administration's (FDA or the Agency) Food Code (Section 4-101.12 Cast Iron, Use Limitation) related to limitations on the use of cast iron utensils for retail food service. Your letter requested that FDA examine the suitability of the Food Code provisions in light of the current production processes for cast iron utensils employed by the firm Lodge Manufacturing of South Pittsburg, Tennessee.

By way of background, the FDA Food Code is a model code offered to state and local agencies that regulate food stores and food service operations as the best science-based and risk-based information available to control food safety hazards in those operations. The Agency uses a vetting process through the Conference for Food Protection—a member organization with representatives from Federal, State and local regulatory agencies, the food industry, academia, and consumer organizations—to consider the content and the need for changes to the Food Code. Information on this process and the May 2014 biennial meeting can be viewed at www.foodprotect.org. For more information about FDA's Retail Food Protection Program, please visit FDA's website at www.fda.gov/retailfoodprotection.

Since the first edition of the FDA Food Code in 1993, Part 4-1 has established the basic requirements for materials used for food equipment and food contact surfaces, as well as the specific limitations associated with specific types of materials, including cast iron, as described in Section 4-101.12. Brief statements about the public health reasons for most FDA Food Code requirements can be found in Annex 3 of the Food Code. The public health reasons in Annex 3 that are related to Part 4-1 and the characteristics for utensils and food contact substances listed in 4-101.11 highlight the importance of having utensils and food contact surfaces manufactured of materials that are smooth and easy to clean. This helps to ensure that food soils and pathogens can be removed by typical cleaning methods used in commercial food establishments. The public health reason provided for the limitations on use of cast iron refers to concerns about the difficulty of cleaning cast iron and specifically mentions that the porosity of the material may render it difficult to clean.

The helpful information you provided with regard to the seasoning process used by Lodge Manufacturing in the production of their cast iron products gives us reason to take

a closer look at this requirement. FDA will consider whether recent changes to cast iron utensil manufacturing processes, such as those used by Lodge Manufacturing, impact the suitability of using cast iron as a food equipment material and if the specific limitations and/or the rationale provided for such limitations should be modified. We appreciate the offer made by Lodge Manufacturing to provide assistance to the Agency as we examine the suitability of this portion of the FDA Food Code and its impact on food equipment manufacturing. This matter is also of interest to FDA with regard to the development and maintenance of national standards that relate to the manufacturing of commercial food equipment. The Agency provides representation on the Joint Committee on Food Equipment, which is administered by NSF International¹ and is responsible for the development of these standards.

Thank you, again, for contacting us regarding this matter. If you have further questions, please let us know.

Sincerely,

A handwritten signature in blue ink that reads "Phil Brubaker for". The signature is written in a cursive style.

Kristina Harper
Supervisory Congressional
Affairs Specialist

¹ <http://www.nsf.org/>