

Daikin America, Inc.
20 Olympic Drive
Orangeburg NY 10962

January 28, 2022

Dennis M. Keefe, Ph.D.
Director, Office of Food Additive Safety
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5001 Campus Drive
College Park, MD 20740

**CONTAINS CONFIDENTIAL
BUSINESS INFORMATION**

Re: Annual Update on Market Volume of Daikin’s FCN Nos. 820, 827, 888, 933, 1044, 1360, and 1451 for Use in Food-Contact Applications in the United States

Dear Dr. Keefe:

The purpose of this letter is to provide an annual update regarding Daikin America, Inc.’s (“Company’s”) voluntary commitment to phase-out its short-chain fluorotelomer products authorized by Food Contact Notification (FCN) Nos. 820, 827, 888, 933, 1044, 1360, and 1451 (hereinafter referred to as “the subject FCNs”).

On July 17, 2020, the Company provided the U.S. Food and Drug Administration (FDA) with a letter of commitment asserting that the Company will, as of December 31, 2023, voluntarily cease the introduction into interstate commerce and delivery for introduction into interstate commerce the products authorized by the subject FCNs for any use in food-contact applications in the United States and subject to the jurisdiction of the U.S. FDA. As part of its commitment, the Company pledged to provide FDA with information on the annual market volume of these products sold for use in food-contact applications in the United States, as well as similar information from 2019 for historic comparison purposes. As stated in its letter of commitment, the Company agreed to provide its first annual update by January 31, 2022.

The Company remains committed to the voluntary phase-out described above and to providing FDA with annual updates according to the timeline identified in its commitment letter. Pursuant to this commitment, the Company is providing the Agency with the following market volume information for 2019 and 2021.

| Year | Annual Sales of Products Authorized by FCN Nos. 820, 827, 888, 933, 1044, 1360, and 1451 (lbs) |
|-------------|---|
| 2019 | (b) (4) |
| 2021 | |

During the past year, the Company has been heavily engaged in developing suitable alternatives for the short-chain fluorotelomer chemistries that have been used as grease-proofing agents for paper in food-contact applications. The Company’s first FCN for an alternative

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grease-proofing agent will become effective on February 1, 2022, and the Company continues to work on further replacement chemistries to allow industry to successfully transition to alternative grease-proofing products. The Company will submit its next annual update to the Agency by January 31, 2023.

Sincerely yours,

(b) (6)

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Trevor Oleson
Business Director
Surface Modification Technologies