



January 31, 2024

Kristi L. Muldoon Jacobs, Ph.D.
Acting 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

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BUSINESS INFORMATION**

Re: Final Update on Market Volume of Daikin’s Short-Chain Fluorotelomer Products

Dear Dr. Muldoon Jacobs:

The purpose of this letter is to provide the final update regarding Daikin America, Inc.’s (“Company’s”) voluntary commitment to phase-out its short-chain fluorotelomer products authorized under the Food Contact Notification (FCN) program. It is responsive to the email of 1/16/24 from Sharon Koh-Fallet to Company’s counsel Devon Hill for such an update.

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 FCN Nos. 820, 827, 888, 933, 1044, 1360, and 1451 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.

The Company has completed the voluntary phase-out described above and to provided 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, 2021, 2022 and 2023.

| Year | Annual Sales of Products Authorized by FCN Nos. 820, 827, 888, 933, 1044, 1360, and 1451 (lbs) |
|------|--|
| 2019 | (b) (4) |
| 2021 | |
| 2022 | |
| 2023 | |

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As shown above, the Company has completely ceased selling its products that are the subject of the market phase-out noted above. 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 grease-proofing agent did become effective on February 1, 2021, and the Company continues to work on further replacement chemistries to allow industry to successfully transition to alternative grease-proofing products. Accordingly, this is the final communication to FDA regarding the voluntary market phase-out described above.

Sincerely yours,

(b) (6)

Trevor Oleson
Business Director
Surface Modification Technologies