



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

May 22, 2023

Gregory S. Lovins
Chief Financial Officer
Avery Dennison Corporation
8080 Norton Parkway
Mentor, OH 44060

Re: Avery Dennison Corporation
Form 10-K for the Fiscal Year Ended December 31, 2022
Filed February 22, 2023
File No. 001-07685

Dear Gregory S. Lovins:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance
Office of Manufacturing