



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